

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-05			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021			Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number      4			Title of Work Assignment/SF Site Name Eval of Industrial Dischargers			
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval				Period of Performance  From   09/26/2016   To   09/25/2017					
Comments: The contractor shall not commence work on this work assignment until September 26, 2016.									
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund           <span>Accounting and Appropriations Data</span> <input checked="" type="checkbox"/> Non-Superfund         </div>									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars) (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:                      Cost/Fee:                      LOE: 09/26/2012   To   09/25/2017									
This Action:									
Total:									
Work Plan / Cost Estimate Approvals									
Contractor WP Dated:                      Cost/Fee                      LOE:									
Cumulative Approved:                      Cost/Fee                      LOE:									
Work Assignment Manager Name   William Swietlik  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-1129 FAX Number:		
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:		
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:		
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:		

**Performance Work Statement  
Contract EP-C-12-021  
Work Assignment 4-05**

**Title:** Evaluating Categories of Industrial Dischargers for Potential National Regulations

**Work Assignment Contracting Officer's Representative (WACOR):**

William F. Swietlik  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6231AA  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-1129  
Fax: 202-566-1053  
E-mail: [swietlik.william@epa.gov](mailto:swietlik.william@epa.gov)

**Alternate Work Assignment Contracting Officer's Representative (AWACOR):**

Jezebele Alicea-Virella  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6233V  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-1755  
Fax: 202-566-1053  
E-mail: [alicea.jezebele@epa.gov](mailto:alicea.jezebele@epa.gov)

**Period of Performance (POP):** September 26, 2016 through September 25, 2017

**Introduction:**

The 1972 Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams (termed “effluent guidelines”) or to sewage treatment plants<sup>1</sup> (termed “pretreatment standards”). The Act also directs EPA to develop national regulations for new industrial facilities (termed “new source performance standards”).

An additional critical component of the Act is that it requires EPA to periodically study and review existing effluent guidelines, pretreatment standards, and standards of performance for new sources and consider the need to develop regulations for industries not covered by a national regulation. These planning requirements are found in several sections of the Clean Water Act

---

<sup>1</sup>Also referred to as publicly owned treatment works or POTWs.



(CWA). Section 304(m) provides for an effluent guideline plan that contains three basic elements to be published on February 4, 1987 and biennially thereafter.

First, EPA must establish a schedule for the annual review of existing effluent guidelines promulgated under Section 304(b), (i.e., limitations for existing direct dischargers) and for annual revision of the guidelines if appropriate (see Section 304(m)(1)(A)). Second, EPA must identify categories of sources that directly discharge toxic or non-conventional pollutants for which EPA has not published effluent limitations guidelines or new source performance standards (see Section 304(m)(1)(B)). Third, EPA must set a schedule for the establishment of national regulations for any categories identified in the second step, with a final promulgated regulation three years after identification in a national plan (see Section 304(m)(1)(C)).

For indirect dischargers, Section 304(g) requires EPA to review at least annually and, if appropriate, revise the pretreatment standards EPA has promulgated under CWA Section 307. In addition, Section 307(b) provides that EPA must promulgate pretreatment standards for categories of sources not subject to existing pretreatment standards if there is pass-through or interference at POTWs. As good government practice, EPA publishes the findings of its annual reviews of direct and indirect dischargers together in one document, the “Effluent Guidelines Program Plan.” EPA publishes a preliminary Plan in odd-numbered years and publishes a final Plan in even-numbered years after public review on the preliminary Plan.

Under this work assignment, ERG will provide technical support to EPA in conducting its Section 304/307 annual review of existing effluent guidelines and standards and identifying and evaluating new sources of wastewater discharges. In addition, ERG will provide support to EPA with the following tasks:

- Develop a work plan and provide bi-monthly and monthly progress reports;
- Develop an electronic schedule compatible with Microsoft Project;
- Develop a revised annotated timeline for completing the 2016 Annual Review Report (ARR) and guiding the 2017 Annual Review (AR) and developing the Final 2016 Effluent Guidelines Program Plan and Preliminary 2018 Plan;
- Prepare quarterly Quality Assurance reports;
- Provide technical support to EPA in evaluating industrial facilities or categories;
- Provide technical support to EPA for briefings and for public and industry outreach activities; and,
- Provide technical support to EPA for Section 304 activities, preparing and maintaining a record, and drafting support documents.

During this work assignment, ERG will provide the following deliverables to EPA:

- Work plan and cost estimate;
- Bi-monthly and monthly progress reports;
- Any necessary revisions to the existing PQAPP, if required by EPA;
- Quarterly Quality Assurance reports;
- Detailed Investigations on Specific Industries Identified by EPA;

- Analysis supporting Section 304 effluent guidelines review activities;
- Docket materials; and,
- Quick turnaround tasks.

### **General Work Assignment Requirements:**

Deliverable Formatting and Terminology. Throughout this Work Assignment, ERG shall provide draft and final reports to EPA in electronic and hard copy formats. The WACOR and contractor will use the terminology in this work assignment to improve the deliverable review process. See Attachment A. ERG shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA Work Assignment Management (WACOR) prior to file preparation. The WACOR will identify for ERG which documents will be posted on EPA's Effluent Guidelines webpage (<http://epa.gov/guide/304m/index.html>). These documents posted to the Effluent Guidelines webpage will need to be Section 508 compliant.<sup>2</sup> For planning purposes, ERG should assume that the following documents will be posted to EPA's Effluent Guidelines webpage: (1) the Annual Review Report for 2016 reviews, the Final 2016 ELG Plan, the 2017 Annual Review Report, the Preliminary 2018 Effluent Guidelines Program Plan, and the Index and User's Guides for the dockets for the respective Plans.

Travel. EPA anticipates a limited need for non-local travel by contractor employees and/or subcontractors to support the scope of this work assignment (e.g., site visits activities, attending public meetings, attending scientific/technical conferences). ERG will provide specific travel details and costs in a request for travel approval submitted for WACOR review and Contract Level Contracting Officer's Representative (CL-COR) signature before each trip occurs (as specified by the contract per clause H.32).

Confidential Business Information. ERG will, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. ERG will manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in its "Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan," dated December 5, 2007 or its successor approved plans. See the CBI Task below for more details.

Identification as Contracting Staff. To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public ERG should refer all interpretations of policy to the WACOR.

Limitation of Contractor Activities. ERG will submit drafts of all deliverables to the EPA Work Assignment Manager (WACOR) for review prior to submission of the final product. ERG will incorporate all WACOR comments into all final deliverables, unless otherwise agreed upon by the WACOR. ERG will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), CL-COR and WACOR.

---

<sup>2</sup> See <http://www.epa.gov/epahome/accessibility.htm>.

**Deliverables.** Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

**Deadlines.** For the purpose of developing the work plan, ERG shall assume the deliverable due dates provided with each task. Most of the deadlines are associated with Agency milestones which are subject to change. Based upon past experience with the 304(m) planning process, any changes in schedule tend to result in extensions, rather than shorter schedules. In either case, if the schedule changes then the WACOR, CL-COR or relevant task manager will change the deliverable deadlines through written technical direction. The WACOR/CL-COR/TM also will use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance. The following table provides a summary of the Agency milestones.

<b>Major Milestones</b>
Publication of the Final 2016 Plan
Publication of the 2016 Annual Review Report (ARR)
Conducting the 2017 Annual Review
Publication of Preliminary 2018 Plan
Publication of the 2017 ARR

**Conferences, Meetings and Other Events:** No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, CL-COR and WACOR of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

## **Tasks:**

### **Task 1 – Program Management (PWS Section 3.0):**

ERG shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. ERG shall also estimate direct costs such as

travel, computer costs, typing, etc.

ERG shall provide electronic copies of the monthly progress reports to the WACOR and CL-COR. Each progress report shall describe the technical work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties.

In addition to the monthly progress reports, ERG shall prepare monthly and mid-monthly status summaries (in a Microsoft Excel compatible format) to the WACOR, CL-COR, and task managers. The monthly and mid-monthly status reports shall list the following information by task: budgeted LOE for each task, summaries of current and cumulative costs and LOE expended for the reporting period. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report.

ERG will prepare an annotated timeline for completing the Final 2016 Plan, the 2017 annual review and for preparing the 2017 ARR and the Final 2016 Effluent Guidelines Program Plan and conducting the 2016 annual review. This annotated timeline will describe the major elements of developing these materials or conducting these investigations from beginning to end and their timing and LOE. The WACOR will use the timeline to identify all major project tasks, track the project's progress, and coordinate all aspects of the project. ERG will update and revise the annotated timeline as needed. The timeline will be used by EPA to help get the 304m planning process back on statutory schedule.

<b>TASK 1 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Deadline</b>
Work Plan	• In accordance with contract requirements
Progress Reports	• Monthly
Mid-Monthly Reports	• Mid-monthly and monthly
1 <sup>st</sup> Draft - Draft Annotated Timeline	• 45 days from issuance of work assignment
2 <sup>nd</sup> Draft - Draft Annotated Timeline	• 14 days from receipt of WACOR comments
1 <sup>st</sup> Draft - Electronic Schedule (compatible with MS Project)	• 45 days from issuance of work assignment
2 <sup>nd</sup> Draft - Electronic Schedule (compatible with MS Project)	• 14 days from receipt of WACOR comments

## **Task 2 – Quality Assurance (PWS Section 3.1):**

### **Task 2: Quality Assurance**

#### **2.1 Background**

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1 A2 (May 2000), and implementing guidance CIO-2105-P-01-0 (May 2000). All projects that involve the generation, collection, analysis, and use of

environmental data must have an approved Quality Assurance Project Plan (QAPP) in place prior to the commencement of the work. This includes both newly generated environmental data as well as that which is already existing. Examples of these environmental data operations are provided in Table 1-1 below.

**Table 1-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data**

Item	Examples
Data	Includes field sampling information (sample location information, flow measurements, temperature, pH, physical observations, etc.), laboratory measurements (e.g., chemical, physical, biological, radiological measurements), data collected from questionnaires, economic data, census data, and any other types of existing data (i.e., data generated for a different purpose or generated by a different organization)
Data generation	Includes field studies, laboratory studies, and generation of modeling output
Data collection	Includes field surveys, questionnaire surveys, literature searches, and third party data
Data evaluation	Includes data inspection, review, assessment, and validation
Data analysis	Includes statistical, engineering, and economic analysis, and testing, evaluation, and validation of methods and models; database creation, data extraction, and data manipulation
Data Use	Any use of data to support EPA decisions, regulations, policy, publications, or tools (including effluent guidelines, 304(m) program, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs)

QAPPs are required for the development or revision of models and software that support the generation, collection, evaluation, analysis, or use of data. (A model is set of equations and assumptions used to predict unknown data.) When existing models are used as a tool to generate or evaluate data, the project QAPP must describe the model and explain how it will be used and how its output will be evaluated to ensure the modeling effort meets the overall quality objectives for the project. Development or revision of new models also must be supported by a QAPP that describes the objectives for the model, the quality criteria that will be applied to the model, and the procedures for evaluating whether the model meets those criteria.

## 2.2 QA Project Plan Requirements

The Contractor has previously prepared a contract-wide Programmatic QAPP (PQAPP) for Contract EP-C-12-021. This PQAPP describes, in a single document, information that is not site or time-specific, but applies throughout the program (i.e., the duration of the contract). When tasked with preparing the PQAPP, the Contractor was informed that the PQAPP may need to be supplemented with project-specific details to support individual work assignments that involve the collection, generation, evaluation, analysis, or use of environmental data for which the PQAPP may not be applicable. As a result, the Contractor prepared a Supplemental QAPP (SQAPP) specific to the IWTT Project described in Task 8. Both the PQAPP and SQAPP have been approved by EPA and cover all activities envisioned under this work assignment. ). EPA has determined that the Contractor will continue operating under the existing PQAPP and SQAPP and that these two documents address the QA requirements for this work assignment. Table 1-2 at the end of this Task demonstrates how the PQAPP/SQAPP address QA requirements for this work assignment.

The activities in this work assignment involve gathering, evaluating, analyzing, and otherwise using existing environmental data (also known as “secondary data”). In support of this work assignment, the Contractor shall ensure that the work plan provides enough detail to clearly describe:

- Specific objectives of the project(s) supported by this work assignment, including typical questions that must be answered when collecting and analyzing existing data to support the development of EPA’s biennial 304m plan.
- The type of data to be gathered or used under this work assignment to support the project objectives—including data from search engines, federal databases, EPA databases—as a well as a rationale for when those databases are appropriate and what data available in each will support the project
- The quality objectives needed to ensure the data will support the project objectives, and
- The QA/QC activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.

### **2.3 Additional QA Documentation Required**

The EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0, May 2000) requires published Agency reports containing environmental data to be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their originally intended application. The EPA Quality Manual further requires Agency reports to be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is included. The purpose of the review is to ensure the reports provide enough information to enable a knowledgeable reader to determine if the technical and quality goals were met for the intended use of the data. Reports should include applicable statements regarding the use of any environmental data presented as a caution about possible misuse of the data for other purposes. For example, a Technical Support Document or Study Report must include a clear discussion of the quality management strategies (including the project goals and objectives, quality objectives and criteria, and QA/QC practices) that were employed to control and document the quality of data generated and used. These documents should also discuss any deviations from procedures documented in the EPA-approved QAPP(s) supporting the project, the reasons for those deviations, any impact of those deviations had on data quality, and steps taken to mitigate data quality issues.

In support of this Agency requirement, all major deliverables (e.g., Technical Support Documents, Study Reports, Analytical Methods) produced by the Contractor under this work assignment must include a discussion of the QA/QC activities that were performed to support the deliverable, and this discussion must provide a sufficient level of detail to allow the EAD QA Coordinator (or designee) to determine if the QA/QC strategies implemented for the project sufficiently support the intended use of the data.

The Contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations

from the QAPP, and corrective actions taken. If desired, the Contractor may include this as a part of the contract-required monthly financial/technical progress report.

## **2.4 Data Quality Act/Information Quality Guidelines Requirements**

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/ data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. (This includes PQAPPs and SQAPPs.) The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a public version and a confidential version at the time the QAPP is submitted for approval by EPA. The public version shall be included in the public docket for the applicable rulemaking (or other docket record), and the confidential version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" should be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors should indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the WACOR can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the WACOR through technical directives, the Contractors may be requested to prepare pre-dissemination review checklists as described in Section 5.5 of the Office of Water - Quality Management Plan, February 2009.



**ERG. EPC12021, FY2017 Work Assignment 4-05: QA CHECKLIST-- Justification for Use of an Existing PQAPP for the Quality Documentation for Projects that Rely on Existing Data**

<b>QAPP Element</b>		<b>Sufficiently Addressed in PQAPP</b>	<b>Not Applicable to Project</b>	<b>Explanatory Comments</b>
<b>A1. Title &amp; Approval Sheet</b>				
Project title		X		
Organization's name		X		
Effective date and/or version identifier		X		
Dated signature of Organization's project manager		X		
Dated signature of Organization's QA manager		X		
Other signatures, as needed (e.g., EAD Project Officer, EAD QA Coordinator)		X		
Revision History		X		
<b>A2. Table of Contents</b>				
Includes sections, figures, tables, references, and appendices		X		
Document control information indicated (when required by the EPA Project Manager and QA Manager)		X		
<b>A3. Distribution List</b>				
Includes all individuals who are to implement or otherwise receive the QAPP and identifies their organization		X		
<b>A4. Project/Task Organization</b>				
Identifies key individuals with their responsibilities (e.g., data users, decision makers, project QA manager, Subcontractors, etc.) and contact info.		X		
Organization chart shows lines of authority & reporting responsibilities		X		
Project QA manager position indicates independence from unit collecting/using data		X		
<b>A5. Problem Definition/Background</b>				
Clearly states problem to be resolved, decision to be made, or hypothesis to be tested		X		
Identifies project objectives or goals		X		
Historical & background information		X		
Cites applicable technical, regulatory, or program-specific quality standards, criteria, or objectives		X		
<b>A6. Project/Task Description</b>				
List measurements to be made/data to obtain			X	
Notes special personnel or equipment requirements			X	
Provides work schedule			X	
<b>A7. Overall Quality Objectives &amp; Criteria</b>				
States overall quality objectives and limits needed to support the project goals and objectives cited in A5		X		
<b>A8. Special Training Requirements/ Certifications</b>				



QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
Identifies specialized skills, training or certification requirements			X	
Discusses how this training will be provided/the necessary skills will be assured and documented			X	
<b>A9. Project-level Documents &amp; Records</b>				
Describes process for distributing the approved QAPP and other planning documents (and updates) to staff		X		
Identifies final work products that will result from the project		X		
Describes the process for developing, reviewing, approving, and disseminating the final work products and individuals responsible for these processes		X		
<b>B1. Data Needs</b>				
Detailed list/description of the specific data elements needed to support project goals		X		For IWTT SQAPP applies
Description of the scope of the data elements that you need (e.g., data supporting specific treatment options vs. the full range of options, data supporting the entire country vs. a specific geographic region)		X		For IWTT SQAPP applies
If project includes development or update of a project database, QAPP identifies and defines each database field		X		For IWTT SQAPP applies
<b>B2. Potential Data Sources</b>				
Identifies and describes potential sources of the existing data needed (e.g., photographs, topographical maps, facility or state files, census data, meteorological data, publications, etc.) and the rationale for their use		X		For IWTT SQAPP applies
If literature searches are used, describes the search engines that will be used and key search terms		X		
If databases or models will be used, describe the database (or model) in terms of who developed it and operates it and the type of data it contains		X		For IWTT SQAPP applies
For other potential sources, describe the potential sources & rationale for considering or using each one		X		For IWTT SQAPP applies
<b>B3. Criteria for Selecting Data Sources</b>				
Identifies each criterion that will be used to determine if the candidate data sources listed in B2 will meet your needs, and how each criterion is defined. (Criteria vary by project; examples include reliability, age, applicability, quantity, format, and others)		X		For IWTT SQAPP applies

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
Explains rating system used to evaluate source against each criterion		X		
<b>B4. Data Value Selection Approach</b>				
For data sources that meet the criteria identified in B3: Describes the criteria and procedures that will be used to determine which value(s) identified in the acceptable sources are most appropriate for use in the project		X		For IWTT SQAPP applies
For data that do not meet these pre-established criteria but are the only data available, explains how the decision to use such data will be made and documented		X		For IWTT SQAPP applies
<b>B5. Resolving Data Gaps</b>				
Describes the process for identifying and addressing data gaps that still exist after candidate data sources have been evaluated and appropriate data values have been identified		X		
Describes the process that will be used to address any new data needs revealed during the data gathering process (i.e., additional data elements not previously considered)		X		
<b>B6. Data Gathering Documentation and Records</b>				
Describes how results of the source selection and the data value selection will be documented, including any sources or values that were rejected and the rationale for not using them		X		For IWTT SQAPP applies
For data that are deemed acceptable and that will be used, explains how each data element will be associated to its original source citation (i.e., bibliographic information, telephone contact reports, email messages, etc.)		X		For IWTT SQAPP applies
<b>C1. Standardization of Data Elements</b>				
Describes the process to ensure that units and other key measures are captured and standardized (or otherwise made comparable) in the database		X		
If the project requires that all fields be standardized to a single set of units (e.g., US dollars for economic data, µg/L for chemical data), identifies the standard units that will be required for each data element		X		
Identifies the procedures for converting data reported in other units to the standardized units, including any rounding or truncating procedures, and procedures for ensuring these conversions are performed correctly		X		

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
If standardization of data elements is not needed, explains the process for ensuring that data presented in varying units are comparable enough for use in the project and that project staff members and other data users will be able to readily identify differences in units		X		
<b>C2. Data Entry</b>				
Explains the process for manually entering selected data into the project database, who will be responsible for such data entry, and the QC strategies that will be used to ensure that the database accurately and completely captures the data as presented in the original source		X		For IWTT SQAPP applies
<b>C3. Merging or Uploading Electronic Data from Existing Sources</b>				
If data are available electronically and will be uploaded or merged into the project database: describes the procedures that will be followed to ensure that errors are not introduced during the upload/merge process and that the final database reflects the original dataset(s)		X		For IWTT SQAPP applies
<b>C4. Data Review</b>				
Describes the process for ensuring that the data have been recorded, transmitted, and processed correctly		X		For IWTT SQAPP applies
<b>C5. Data Storage and Manipulation</b>				
Describes how the existing data will be stored		X		For IWTT SQAPP applies
Describes who will be responsible for access to and maintenance of the stored data		X		For IWTT SQAPP applies
Describes how the existing data will be incorporated with other project data to support the project goal/decision to be made		X		For IWTT SQAPP applies
Describes the QC strategies that will be employed to ensure that the integrity of the data is not compromised during data storage, access/retrieval, updates, or other manipulation		X		For IWTT SQAPP applies
<b>D1. Data Quality Verification and Data Quality Reporting</b>				
Describes the process for verifying that the final set of data meets the overall criteria originally specified for the project		X		For IWTT SQAPP applies
Describes how these determinations will be documented and reported		X		For IWTT SQAPP applies

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
For data that don't meet the pre-established specifications, explains the process for determining if they are usable and how such decisions will be documented		X		For IWTT SQAPP applies
<b>D2. Use/Analysis of the Existing Data</b>				
Provides details regarding the exact means in which the data will be used to meet project objectives		X		For IWTT SQAPP applies
Includes an explanation or list of the information to be calculated and the data elements that will be used to make those calculations		X		For IWTT SQAPP applies
Includes applicable calculations and equations (if known) or explanations of how they will be developed		X		For IWTT SQAPP applies
Includes plans for excluding outliers				
<b>D3. Methodology Documentation and Conceptual Review</b>				
If exact methodologies for analyzing the data will need to be developed or modified during the course of data analysis, explains the process by which such methodologies will be documented, who is responsible for reviewing/ approving their use, and how the methodologies will be checked to ensure they yield the desired products		X		For IWTT SQAPP applies
<b>D4. Technical Review of the Data Analysis</b>				
Describes activities that will be used to ensure the data analyses are being implemented as specified and will support project objectives		X		For IWTT SQAPP applies
Explains procedures for identifying and notifying appropriate personnel if changes to the originally planned procedures are warranted, and the process for approving, documenting and implementing such changes		X		For IWTT SQAPP applies
<b>D5. Final Verification of Data Analysis and Reconciliation with User Requirements</b>				
Describes the process for reviewing the final work product to ensure that the work was generated in accordance with the QAPP, and that the work product addresses the overall project goals and objectives		X		For IWTT SQAPP applies
Describes how the results of this assessment will be documented		X		For IWTT SQAPP applies
Describes how any limitations of the data or data analyses that were used to prepare the final work product will be documented and communicated		X		For IWTT SQAPP applies

## **Deliverables and schedule under Task 2**

<b>TASK 2 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Deadline</b>
SQAPP	• 10 days after notification by the WACOR and or QAC that an SQAPP is needed.
Revisions based on EPA feedback	• 7 days after receipt of EPA feedback.
Final SQAPP for this Work Assignment	• 5 days after EPA feedback
PQAPP/SQAPP progress reports	• Monthly

### **Task 3 – Completion of 2016 Annual Review Report (ARR) (PWS Section 3.6)**

ERG shall support EPA in completing the 2016 304m Annual Review Report (ARR). ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2016 ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts, including 508 formatting of all necessary documents.

ERG shall also finish assembling all information for the public and confidential records for the 2016 annual review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any Federal Docket Management System (FDMS) requirements.

<b>TASK 3– DELIVERABLES</b>	
<b>Deliverable</b>	<b>Date</b>
Complete the 2016 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a final draft of the 2016 ARR	• According to a schedule developed by ERG and approved by the WACOR.
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WACOR.
Provide the Final 2016 Annual Review Report	• According to a schedule developed by ERG and approved by the WACOR.

### **Task 4 -- Preparation and Publication of the Preliminary 2016 Final Plan (PWS Section 3.6)**

ERG shall support EPA in writing and completing the Final 2016 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Final 2016 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft of the Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan.

ERG shall also finish assembling all information for the public and confidential records for the Final 2016 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

<b>TASK 4– DELIVERABLES</b>	
<b>Deliverable</b>	<b>Date</b>
Draft the Final. 2016 ELG Plan	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a draft of the Final Plan	• According to a schedule developed by ERG and approved by the WACOR.
Compile, address and respond to all public comments from the Final 2016 Plan	• According to a schedule developed by ERG and approved by the WACOR.
Respond to WACOR/reviewer comments and necessary revisions to the document	• Within 10 working days after being provided by the WACOR.

**Task 5 – Conduct of the 2017 Annual Review AR) and Preparation of the 2017 Annual Review Report (ARR) (PWS Section 3.6)**

ERG shall support EPA in completing the 2017 304m annual review and in preparing the 2017 Annual Review Report (ARR). The 2017 annual review is to be completed using methods and approaches agreed upon by the WACOR. ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2017 annual review and the ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts, including 508 formatting of all necessary documents.

ERG shall also finish assembling all information for the public and confidential records for the 2017 review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

<b>TASK 5– DELIVERABLES</b>	
<b>Deliverable</b>	<b>Date</b>
Complete the 2017 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a final draft of the 2017 ARR	• According to a schedule developed by ERG and approved by the WACOR.
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WACOR.
Provide the Final 2017 Annual Review Report	• According to a schedule developed by ERG and approved by the WACOR.

**Task 6 - Preparation and Publication of the Preliminary 2018 Plan (PWS Section 3.6)**

ERG shall support EPA in preparing the Preliminary 2018 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Preliminary

2018 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan, including 508 formatting of all necessary documents.

ERG shall also assemble all information for the public and confidential records for the Preliminary 2018 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FMDS requirements.

<b>TASK 6– DELIVERABLES</b>	
<b>Deliverable</b>	<b>Date</b>
Draft the Preliminary 2018 ELG Plan	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a draft of the Preliminary 2018 Plan	• According to a schedule developed by ERG and approved by the WACOR.
Respond to WACOR/reviewer comments and necessary revisions to the Preliminary 2018 Plan	• Within 10 working days after being provided by the WACOR.
Provide the final draft of the Preliminary 2018 ELG Plan ready for publication	• According to a schedule developed by ERG and approved by the WACOR.

**Task 7 – Conduct and Prepare Other Studies and Investigations as Needed (PWS Sections 3.2, 3.5 and 3.6)**

ERG shall provide support for the implementation of existing and potentially revised effluent guidelines rulemakings, including preliminary category reviews, Preliminary Studies and other investigations of industry discharges as needed and identified by EPA and from the annual reviews. For other studies and investigation planning purposes ERG should assume ten investigations and other studies will be necessary during the performance period. ERG shall also support other ongoing investigations such as nanomaterials, pesticides, the DMR/TRI Comparison, the review of international industrial discharge databases, TSCA Work Plan Chemicals, nutrient discharges by industry, old ELG analyses, etc. as directed by the WACOR.

<b>TASK 7– DELIVERABLES</b>	
<b>Deliverable</b>	<b>Date</b>
Drafts of other studies and investigations as needed.	According to a schedule developed by ERG and approved by the WACOR.
Final reports/memos for other studies and investigations	• According to a schedule developed by ERG and approved by the WACOR.

**Task 8 – Industrial Wastewater Treatment Technology (IWTT) and Historic ELG Access (HELGA) Databases (PWS Section 3.5)**

ERG shall provide technical support for the continued development and ongoing implementation of databases for the support of 304m planning and ELG implementation, including the IWTT Database and the HELGA Database. Specifically, ERG will help with the preparation of the

databases where necessary, coordinate with other contractors, share data and information for populating the databases, support ongoing collection of data and information to go into the databases, and assist with public outreach and communication as directed by the WACOR and Task Manager.

<b>TASK 8– DELIVERABLES</b>	
<b>Deliverable</b>	<b>Date</b>
Ongoing population of IWTT and HELGA	Ongoing, with Technical Direction from WACOR and TM
Completion of IWTT database reports and formats	According to a schedule developed by ERG and approved by the WACOR and TM.
Preparing the IWTT Database for public access	According to a schedule developed by ERG and approved by the WACOR and TM.
Revising, if needed, the HELGA Database based on EPA input	According to a schedule developed by ERG and approved by the WACOR and TM

**Task 9 – General Effluent Guidelines Implementation Support and Technical Support (PWS Section 3.7)**

ERG shall provide technical support for the implementation of existing effluent guidelines rulemakings. Specifically, ERG will help with the preparation of guidance documents supporting the implementation of the existing effluent guidelines. For planning purposes ERG should assume ten technical memos supporting existing effluent guidelines. Preparation of these ten technical memos will likely involve the review of current permits and fact sheets, DMR data, and other facility specific information.

ERG will provide technical support to the EPA in responding to inquiries from other EPA offices, stakeholders, and permitting authorities in implementing existing effluent guidelines. For planning purposes ERG should assume twelve requests of varying effort will be required by EPA during the period of performance.

ERG will prepare materials identified by the WACOR through written technical direction to support Agency briefings as well as EPA's 304(m) outreach activities to the public and to industry. These materials may include presentations, reports, brochures, leaflets, and posters.

ERG shall provide supporting information for briefings and support on FOIAs (i.e. locating and supplying the WACOR or CL-COR with relevant information to be used in the Agency's response to the FOIA) as directed in writing by the WACOR or CL-COR. For purposes of the workplan, ERG shall assume that it will support three FOIA requests and three briefings.

ERG may be required to attend outreach activities or ship materials on a case-by-case basis as required by the WACOR's technical direction. ERG will submit detailed plans and approaches upon receipt of technical direction from the WACOR. ERG will submit materials to EPA for review and approval prior to their implementation. When conducting outreach activities, ERG personnel will clearly identify themselves as contractor employees both orally and via the use of identification badges. Typically ERG will be required to provide products within two weeks or



less.

<b>TASK 9 – DELIVERABLES</b>	
<b>Deliverables</b>	<b>Deadline</b>
Ten Technical Memos Supporting Existing Effluent Guidelines	• By written technical direction.
Twelve Technical Support Actions For EPA Offices, Stakeholders, And Permitting Authorities In Implementing Existing Effluent Guidelines	• By written technical direction.
Presentations, Reports, Brochures, Leaflets, And Posters	• By written technical direction.
Briefing / FOIA Support	• Requests to be supplied within 14 days

#### **Task 10 – CBI Procedures (PWS Section 3.7)**

During the course of the work assignment, ERG will be accessing and evaluating CBI. As such, ERG shall adhere to EPA's CBI policy and procedures as described in the contract statement of work, Section 1.2. ERG must maintain CBI security clearance to use CBI information (Refer to Section H of the schedule for security requirements and 70 FR 9070; February 24, 2005). ERG will not disclose any CBI to anyone other than EPA without prior written approval from the WACOR. ERG shall utilize CBI information in accordance with contract requirements and limitations to include using the “Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan,” dated August 1, 2011 or its successor approved plans.

<b>TASK 10 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Deadline</b>
A CBI program in compliance with the requirements of the contract and the requirements of ERG’s CBI Plan.	• Ongoing

#### **Task 11 – EJScreen (PWS Section 5.0)**

ERG will provide ongoing support for developing the new water indicator for EJSCREEN in conjunction with OEJ and the TRI program and their respective contractors. ERG shall also provide technical support to EPA at workgroup meetings and provide support to assist EPA in implementing the new water indicator once drafted, and supporting any public information dissemination.

<b>TASK 11 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Deadline</b>
Prepare the enhanced Water Indicator	According to a schedule developed by ERG and approved by the WACOR.
Provide ongoing support for briefing OW management, OEI and OEJ	According to a schedule developed by ERG and approved by the WACOR.

Assist EPA in making revisions to the new indicator given EPA feedback	According to a schedule developed by ERG and approved by the WACOR.
Develop final data inputs for the Water Indicator for EJScreen	According to a schedule developed by ERG and approved by the WACOR.
Technical support to EPA at workgroup meetings	Ongoing

## **Task 12 – Records Management (PWS Section 3.7)**

This task requires ERG to complete any unfinished records management work started under the previous work assignment. As EAD's prime technical contractor for many years, the Contractor has stored and managed confidential (CBI) and nonconfidential (non-CBI) records for numerous rulemakings and other EAD activities. After conducting reviews in 2012 and 2014, the Contractor reported possessing records for, among others, the following (docket numbers included, if appropriate):

Concentrated Animal Feeding Operations (CAFOs): EPA-HQ-OW-2002-0025 and EPA-HQ-OW-2005-0037

Coal Mining (Western Remining): W-99-13

Coastal Oil and Gas

Pharmaceutical Manufacturing: OW-2003-007, plus a 09/1998 rule for which there was no docket number

POTW Study

Synthetic-based Drilling Fluids

Airport Deicing: EPA-HQ-2004-0038

Iron and Steel: W-00-25 II and EPA-OW-2002-0027

Pulp and Paper: no docket numbers for 04/1998 rule or 08/1998 amendment

Alaska Cruise Ships

Metal Products and Machinery Project File

Since the dockets above are now inactive, it is appropriate to properly archive those records which should be preserved and to destroy those records for which EAD no longer has any need of retention. As a general matter, EAD tasks the Contractor with disposal of any non-CBI found in the records listed above. The only non-CBI records that may be retained, at EAD's direction, are those which may be used to assemble future historic ELG databases.

Any CBI in the records above will be handled one of two ways: either destruction or preparation for transfer to the Federal Records Center (FRC). Any CBI non-docket items shall be destroyed, with their CBI cover sheets retained and delivered to EAD if the CBI passed through EAD. CBI docket items, on the other hand, will be prepared for delivery to the FRC, on a docket-by-docket basis. The Contractor will prepare indices in MS Word and Adobe Acrobat formats for each box of such CBI records. Once completed, the Contractor will arrange for delivery of the boxes to EAD.

<b>TASK 12 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Deadline</b>
Completing Disposal of non-CBI	According to a schedule developed by ERG and approved by the WACOR and TM.
Completing Destruction of CBI non-records	According to a schedule developed by ERG and approved by the WACOR and TM.
Completing Boxing and Delivery of CBI records to EAD, properly boxed and indexed	According to a schedule developed by ERG and approved by the WACOR and TM.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-05			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021		Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number      4		Title of Work Assignment/SF Site Name Eval of Industrial Dischargers					
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance  From   09/26/2016   To   09/25/2017			
Comments:									
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)  (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee: \$0.00		LOE: 0					
09/26/2012 To 09/25/2017									
This Action:		\$609,910.00		6,250					
Total:		\$609,910.00		6,250					
Work Plan / Cost Estimate Approvals									
Contractor WP Dated: 10/06/2016		Cost/Fee \$609,910.00		LOE: 6,250					
Cumulative Approved:		Cost/Fee \$609,910.00		LOE: 6,250					
Work Assignment Manager Name   William Swietlik  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-566-1129 FAX Number:			
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2017			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number                      4			Eval of Industrial Dischargers				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW N/A					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From 01/13/2017 To 09/25/2017					
Comments:										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
09/26/2012 To 09/25/2017										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:					Cost/Fee			LOE:		
Cumulative Approved:					Cost/Fee			LOE:		
Work Assignment Manager Name William Swietlik							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-566-1129			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 513-487-2352			
							FAX Number:			

**Performance Work Statement  
Contract EP-C-12-021  
Work Assignment 4-05  
Amendment 1**

**Title:** Evaluating Categories of Industrial Dischargers for Potential National Regulations

**Work Assignment Contracting Officer's Representative (WACOR):**

William F. Swietlik  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6231AA  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-1129  
Fax: 202-566-1053  
E-mail: [swietlik.william@epa.gov](mailto:swietlik.william@epa.gov)

**Alternate Work Assignment Contracting Officer's Representative (AWACOR):**

Jezebele Alicea  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6233U  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-1755  
Fax: 202-566-1053  
E-mail: [alicea.jezebele@epa.gov](mailto:alicea.jezebele@epa.gov)

**Period of Performance:** January 13, 2017 through September 25, 2017

**Purpose:** The purpose of this amendment is to add Tom Born and Steve Whitlock as Task Managers for directing studies by the contractor on investigating Perfluorinated Compounds (PFCs) and Food Manufacturing, and on Nutrients, respectively, under Task 7. Nothing else is being changed.

**New Task Managers for Task 7:**

**Work on PFCs and Food Manufacturing:**

Tom Born  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6233X  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-1001  
Fax: 202-566-1053  
E-mail: [born.thomas@epa.gov](mailto:born.thomas@epa.gov)

**Work on Nutrients:**

Steve Whitlock  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6233U  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-1541  
Fax: 202-566-1053  
E-mail: [whitlock.steve@epa.gov](mailto:whitlock.steve@epa.gov)

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-05			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021		Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number      4		Title of Work Assignment/SF Site Name Eval of Industrial Dischargers					
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance  From   09/26/2016   To   09/25/2017			
Comments:									
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)  (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee: \$0.00		LOE: 0					
09/26/2012 To 09/25/2017									
This Action:		\$609,910.00		6,250					
Total:		\$609,910.00		6,250					
Work Plan / Cost Estimate Approvals									
Contractor WP Dated: 10/06/2016		Cost/Fee \$609,910.00		LOE: 6,250					
Cumulative Approved:		Cost/Fee \$609,910.00		LOE: 6,250					
Work Assignment Manager Name   William Swietlik  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-566-1129 FAX Number:			
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-29			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021			Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Steam Elec ELG Reg Support			
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   09/29/2016   To   09/25/2017			
Comments:									
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund									
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)  (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee:			LOE:				
09/26/2012   To   09/25/2017									
This Action:									
Total:									
Work Plan / Cost Estimate Approvals									
Contractor WP Dated:				Cost/Fee		LOE:			
Cumulative Approved:				Cost/Fee		LOE:			
Work Assignment Manager Name   Ronald Jordan  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number: 202-566-1003			
						FAX Number:			
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number: 202-566-1040			
						FAX Number:			
Other Agency Official Name  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number:			
						FAX Number:			
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number: 513-487-2352			
						FAX Number:			



**Performance Work Statement  
Contract EP-C-12-021  
Work Assignment 4-29**

**Title:** Steam Electric Effluent Guidelines Regulatory Support

**Work Assignment Contracting Officer's Representative (WACOR):**

Ronald Jordan  
USEPA Headquarters  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 4303T  
Washington, DC 20460

Phone: 202-566-1003  
Fax: 202-566-1053  
E-mail: [jordan.ronald@epa.gov](mailto:jordan.ronald@epa.gov)

**Period of Performance:** September 29, 2016 through September 25, 2017

**Introduction:**

---

The Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams or to sewage treatment plants. During previous option periods, the contractor collected and analyzed information that EPA used to develop effluent limitations and guidelines (ELGs) for the steam electric power generating point source category, which were signed by the Administrator on September 30, 2015. This work assignment supports EPA's post-promulgation activities for the steam electric power generating effluent guidelines and other related activities associated with steam electric power generation at industrial facilities or industrial activities that are similar to steam electric processes.

Key tasks under this work assignment include:

- Providing technical support for outreach and implementation activities, including public meetings and NPDES permit writer training.
- Assisting in litigation including evaluating technical issues raised in litigants' merit briefs.
- Reviewing FDF variance requests and evaluating the information submitted as it relates to information in the record for the ELGs.
- Providing technical support in reviewing and responding to Freedom of Information Act requests.

- Compiling information characterizing operations and wastewater discharges at industrial non-utilities and other operations similar to steam electric processes.
- Investigating technologies available for treating wastewater from mines, particularly abandoned mines in the western U.S.

## **II- General Work Assignment Requirements (PWS Section 3.0)**

---

### **Deliverable Formatting and Terminology**

---

Throughout this work assignment, the contractor shall provide draft and final reports to EPA in electronic format, with hard copy format also provided when directed by the WACOR. The EPA WACOR and contractor will use the terminology defined in Attachment A to improve the deliverable review process. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA WACOR prior to file preparation.

In addition, the EPA WACOR will identify for the contractor which documents will be posted on EPA's Effluent Guidelines webpage ([http://water.epa.gov/scitech/wastetech/guide/steam\\_index.cfm](http://water.epa.gov/scitech/wastetech/guide/steam_index.cfm)). These documents posted to the Effluent Guidelines webpage must be Section 508 compliant.<sup>1</sup>

### **Travel**

---

Non-local travel by the contractor employees or subcontractors will be required to support the scope of this work assignment. The contractor shall provide specific travel details and costs for any travel directly chargeable under this WA and must submit it for travel approval by the WACOR and the Contract Level Contracting Officer's Representative (CL-COR) before each trip occurs (as specified by the contract per clause H.32).

Under this WA, EPA staff is planning to attend the International Water Conference on November 6-10, 2016 in San Antonio, Texas. For planning purposes, the contractor shall include one staff attending this conference to support EPA. The contractor shall also assume, for planning purposes, that there will be one site visit trip to a power plant in the southeastern U.S. and one trip to West Virginia to support NPDES permit writer training.

### **Event Expenses Not to Exceed \$20,000**

---

No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer (CO), CI-COR and WACOR of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance.

Conference expenses are all direct and indirect costs paid by the government and include any

---

<sup>1</sup> See <http://www.epa.gov/epahome/accessibility.htm>.

associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the CO.

#### Confidential Business Information

---

During the course of the work assignment, the contractor will be accessing and evaluating CBI. The contractor shall, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor shall manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in the “Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan” (August 1, 2011) or its successor approved plans.

#### Identification as Contracting Staff

---

To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public the contractor should refer all interpretations of policy to the EPA WACOR.

#### Limitation of Contractor Activities

---

The contractor shall submit drafts of all deliverables to the EPA WACOR for review prior to submission of the final product. The contractor shall incorporate all EPA WACOR comments into all final deliverables, unless otherwise agreed upon by the EPA WACOR. The contractor will adhere to all applicable EPA management control procedures as implemented by the CO, CI-COR and WACOR.

#### Deliverable Due Dates

---

For developing this WA workplan, the contractor shall assume the deliverable due dates in the tables for each task presented further. The WACOR needs to provide to the contractor technical direction where deliverable dates are not specified in tables. Major technical deliverables shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

### III- Tasks

---

#### Task 1 – Program Management (PWS Section 3.0)

---

The contractor shall develop a detailed workplan that outlines the approach and methodology necessary for each task identified in this work assignment. The workplan shall specify the necessary steps for each task; list of the personnel projected to participate; direct and indirect costs such as labor, and travel; and estimated hours and budget by task and deliverables to complete this work assignment. The workplan shall be submitted to the EPA PO and EPA WACOR by 15 days after receiving the work assignment.

The contractor shall prepare and submit electronic monthly progress reports to the EPA WACOR and EPA PO. This progress report will document the costs incurred and work performed during the previous accounting period, and the work planned for the current accounting period.

In addition to a monthly progress report, the contractor shall prepare mid-monthly and monthly status summaries to the EPA WACOR and EPA PO. The mid-monthly and monthly status reports shall list the following information by task: summaries of costs and LOE expended for the reporting period; a table of hours by personnel for each task; and the cumulative hours (LOE) and dollars (and the percentage of each) expended for each task. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report. These reports and summaries shall use a format similar to that used by the contractor to report such information for work assignment 3-29. The contractor shall inform the EPA CO, PO and WACOR in writing when 50%, 75%, and 90% of the allocated hours or dollars have been expended.

TASK 1 – DELIVERABLES	
Deliverable	Due Date
Workplan	15 days from issuance of work assignment
Monthly Progress Reports	Monthly
Monthly & Mid-monthly Status Summaries	Mid-monthly and monthly

#### Task 2 – Quality Assurance (PWS Section 3.1)

---

This work assignment includes continuing certain tasks for the steam electric effluent guidelines and related activities that were initiated under WA 3-29. As such, the previously approved QAPP (Revision 4, dated April 2013) applies to the tasks covered by this work assignment. In addition, the contractor shall evaluate whether revisions to the QAPP are warranted and communicate such potential changes with the WACOR. Should revisions to the QAPP be determined to be necessary, the WACOR will issue a technical direction establishing the delivery date for a revision QAPP.

## **2.1 Background**

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1 A2 (May 2000), and implementing guidance CIO-2105-P-01-0 (May 2000). All projects that involve the generation, collection, analysis, and use of environmental data must have an approved Quality Assurance Project Plan (QAPP) in place prior to the commencement of the work. Examples of these environmental data operations are provided in **Table 1-1** below.

**Table 1-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data**

<b>Item</b>	<b>Examples</b>
Data	Includes field sampling information (sample location information, flow measurements, temperature, pH, physical observations, etc.), laboratory measurements (e.g., chemical, physical, biological, radiological measurements), data collected from questionnaires, economic data, census data, and any other types of existing data (i.e., data generated for a different purpose or generated by a different organization)
Data generation	Includes field studies, laboratory studies, and generation of modeling output
Data collection	Includes field surveys, questionnaire surveys, literature searches, and third party data
Data evaluation	Includes data inspection, review, assessment, and validation
Data analysis	Includes statistical, engineering, and economic analysis, and testing, evaluation, and validation of methods and models; database creation, data extraction, and data manipulation
Data Use	Any use of data to support EPA decisions, regulations, policy, publications, or tools (including effluent guidelines, 304(m) program, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs)

Note that QAPPs are required for the development or revision of models and software that support the generation, collection, evaluation, analysis, or use of data. (A model is set of equations and assumptions used to predict unknown data.) When existing models are used as a tool to generate or evaluate data, the project QAPP must describe the model and explain how it will be used and how its output will be evaluated to ensure the modeling effort meets the overall quality objectives for the project. Development or revision of new models also must be supported by a QAPP that describes the objectives for the model, the quality criteria that will be applied to the model, and the procedures for evaluating whether the model meets those criteria.

## **2.2 QA Project Plan Requirements**

The Contractor has previously prepared a contract-wide Programmatic QAPP (PQAPP) for

Contract EP-C-12-021. This PQAPP describes, in a single document, information that is not site or time-specific, but applies throughout the program (i.e., the duration of the contract). When tasked with preparing the PQAPP, the Contractor was informed that the PQAPP may need to be supplemented with project-specific details to support individual work assignments that involve the collection, generation, evaluation, analysis, or use of environmental data.

The activities in this work assignment involve gathering, evaluating, analyzing, and otherwise using existing environmental data (also known as “secondary” use of data). However, EPA has determined that the Contractor is operating under the existing PQAPP and that the PQAPP addresses QA requirements for this work assignment.

In support of this work assignment, the Contractor shall ensure that the work plan provides enough detail to clearly describe specific objectives of the project(s) supported by this work assignment, including typical questions that must be answered when collecting and analyzing existing data to support effluent limitations and guidelines industry rulemaking.

- The type of data to be gathered or used under this work assignment to support the project objectives—including data from search engines, federal databases, EPA data bases—as a well as a rationale for when those databases are appropriate and what data available in each will support the project
- The quality objectives needed to ensure the data will support the project objectives, and
- The QA/QC activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.

### ***2.3 Additional QA Documentation Required***

The EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0, May 2000) requires published Agency reports containing environmental data to be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their originally intended application. The EPA Quality Manual further requires Agency reports to be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is included. The purpose of the review is to ensure the reports provide enough information to enable a knowledgeable reader to determine if the technical and quality goals were met for the intended use of the data. Reports should include applicable statements regarding the use of any environmental data presented as a caution about possible misuse of the data for other purposes.

For example, a Technical Support Document or Study Report must include a clear discussion of the quality management strategies (including the project goals and objectives, quality objectives and criteria, and QA/QC practices) that were employed to control and document the quality of data generated and used. These documents should also discuss any deviations from procedures documented in the EPA-approved QAPP(s) supporting the project, the reasons for those deviations, any impact of those deviations had on data quality, and steps taken to mitigate data quality issues.

In support of this Agency requirement, all major deliverables (e.g., Technical Support Documents, Study Reports, Analytical Methods) produced by the Contractor under this work assignment must include a discussion of the QA/QC activities that were performed to support the deliverable, and this discussion must provide a sufficient level of detail to allow the EAD QA Coordinator (or designee) to determine if the QA/QC strategies implemented for the project sufficiently support the intended use of the data. Upon receipt, the EPA WACOR will review each applicable report and certify whether the Contractor has adhered to the QA requirements documented in the Contractor's PQAPP.

The Contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the QAPP, and corrective actions taken. If desired, the Contractor may include this as a part of the contract-required monthly financial and technical progress report.

#### ***2.4 Data Quality Act/Information Quality Guidelines Requirements***

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/ data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. (This includes PQAPPs and SQAPPs.) The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a sanitized (i.e., public) version and an unsanitized (i.e., confidential) version at the time the QAPP is submitted for approval by EPA. The sanitized version shall be included in the public docket for the applicable rulemaking (or other docket record), and the unsanitized version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" should be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors should indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the EPA WACOR can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the EPA WACOR, the Contractors may be requested to prepare pre-dissemination review checklist as described in Section 5.5 of the Office of Water Quality Management Plan, February 2009. If this is required, the EPA WACOR shall notify the Contractor through written technical direction.



Tasks included in this work assignment are continuing work for the steam electric effluent guidelines that was covered by the QAPP approved on April 2013.

<b>TASK 2 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Due Date</b>
Monthly Reports of QA work performed (may be included in the Contractor’s monthly progress report)	Monthly throughout the WA period of performance

---

**Task 3 – Technical and Record Support Related to the Steam Electric Effluent Guidelines and Other Steam-Related Operations (PWS Section 3.6, 3.7, 4.0, 4.7, 5.0)**

---

During the previous option period, the contractor collected, analyzed information necessary to develop effluent guidelines regulations for the steam electric power generating point source category proposed rule. In this work assignment, contractor shall continue necessary tasks to support implementation of the final rule. The contractor shall provide technical support for EPA’s evaluation of power company requests for fundamentally different factors (FDF) variances and other analyses related to the steam electric industry, similar operations, and the effluent guidelines. Activities under this task may include characterization of pollutant discharges, analyses of industry survey data, technology and process change evaluations, calculation of compliance costs and pollutant reductions, and preparation of technical documentation and memoranda, and other tasks as identified by the WACOR.

The contractor shall provide support in responding to Freedom of Information Act (FOIA) requests for records. Such support includes researching existing documentation to identify potentially responsive records for the FOIA request or any FOIA appeal, and assisting EPA in compiling responsive documents. For purposes of developing the workplan, the contractor shall assume that, in addition to the FOIA actions already in progress, there will be at least five new FOIA requests for which support may be required.

The contractor shall maintain a record of all documents relevant to the rulemaking proceedings, including preparing electronic versions of documents for the Agency’s electronic docket system and preparing non-CBI versions (sanitized) of documents for public release. When directed by the WACOR, the contractor shall deliver documents to the electronic docket. The project file index will contain project file-only documents in addition to all draft record index documents. The contractor shall also compile and maintain a record of all documents relevant to FDF variance proceedings.

The contractor shall follow EPA’s policy for Section 508 compliance as issued by the Edocket office. The contractor shall properly maintain any non-record working files in its possession including timely disposition in accordance with EPA records management policy. This includes any necessary cleanup of files and transfer of CBI records to the Federal Records Center.



The contractor shall participate in the International Water Conference, as described under the travel section, to obtain newly-released information on the state-of-the-art treatment technologies for waste streams under study.

The contractor shall compile information characterizing power plants located at industrial facilities (i.e., “industrial non-utilities”), including reviewing available information to facilitate EPA determining whether a targeted rulemaking to address wastewater discharges may be warranted, or if such discharges would be better addressed by placing emphasis on establishing BPJ limits during NPDES permit renewal for a subset of affected facilities. The review should identify the number of such power plants, the types of facilities they are located at, fuel sources, generating capacity, and other relevant information. Factors such as geographic location shall be investigated, as well as comparing data for industrial power plants powered by fossil fuels to those powered by non-fossil fuels (as well as comparing data for different types of fossil fuels). The review shall place particular emphasis on coal-fired power plants and those plants with wet ash handling and/or wet flue gas desulfurization systems. For power plants powered by non-fossil fuels, the review shall investigate whether there are certain such fuels that warrant further investigation (e.g., black liquor at pulp mills). This effort builds upon the work initiated under WA 3-29, including identifying specific facilities (including NPDES permit numbers and permit renewal dates) to assess opportunities for enhancing development of BPJ-BAT effluent limitations. The contractor shall also compile and review information for other operations similar to steam electric processes, such as facilities that produce steam primarily for heating or to support industrial processes.

<b>TASK 3 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Due Date</b>
Draft technical evaluation documentation for FDF variance requests	By written technical direction
Draft text for inclusion in Federal Register notices related to FDF variances	3 weeks following technical direction by WACOR
Index of the project file	February 28, 2017 (post-promulgation items only)
	August 31, 2017 (only those items added since the Feb 2017 index)
Priority list of industrial non-utilities for potential BPJ-BAT effluent limitations development	December 15, 2016

<b>TASK 3 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Due Date</b>
Review of steam-related processes (excluding Part 423 and industrial non-utilities) <ul style="list-style-type: none"> <li>- Proposed study plan</li> <li>- Draft report</li> <li>- Final report</li> </ul>	November 30, 2016 March 31, 2017 June 30, 2017
Identify/compile FOIA-responsive records	TBD by WACOR

#### **Task 4 – Litigation Support**

---

This task includes administrative index assembly, record searches, review of EPA’s responses to public comments on the proposed rule, and other searches and analyses associated with litigation on the effluent guidelines, including FOIA-related litigation. This task may also include technical support and permit review for purpose of preparing legal briefs.

Under this task, the contractor shall implement changes to the administrative index that may be directed by the court, and compile documents as required for delivery to agents of the court or parties involved in the litigation. Also, the contractor shall conduct searches of comments and responses to support Agency legal briefs, and shall retrieve record items in support of Agency litigation. The litigation schedule is dictated by the court and is subject to postponement due to consideration of legal motions; however, for purposes of the workplan the contractor should assume that most support in calendar year 2016 will be related to procedural motions and that support related to merits briefs will occur in early calendar year 2017.

<b>TASK 4 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Due Date</b>
Provide draft technical response for issues raised in merit briefs	By written technical direction
Identify and compile litigation-responsive records	By written technical direction

#### **Task 5: Implementation and training support (PWS 3.7)**

---

Activities under this task support the development of implementation support documents for

permit writers and the regulated industry. This task includes preparation of training materials, frequently asked questions, fact sheets, question and answer documents, case studies, cost tools, compliance cost calculators, development of benchmarks and document review processes for internal consistency, and related implementation support activities. This task also includes assistance in the development of a module(s) for the NPDES permit writer training sessions.

Because of the complex nature of the ELGs, support will be provided to collect, compile, analyze, and present information and data, which may be used to develop the technical and scientific basis of draft guidance on NPDES permitting. Supplemental memos and supporting documents will be designed to provide permit writers responsible for issuing permits with information and data on control strategies, technology performance information, assessment methodologies and tools, water quality concerns, environmental impacts, and sampling techniques. These documents may also provide draft model permit language for steam electric power plants.

<b>TASK 5 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Due Date</b>
Draft materials for NPDES permit writer training	January 31, 2017

---

**Task 6 – General Technical Support (PWS Section 3.6, 3.7)**

---

Using information provided by the EPA WACOR, along with information gathered or developed by the contractor, the contractor shall assemble information and perform analyses related to steam electric power plants, other electric generating units, and similar processes (e.g., facilities primarily producing steam for heat and other purposes rather than to generate electricity) as directed by the EPA WACOR through written technical direction. Much of the information used is expected to be an outgrowth of data collected under the other tasks of this work assignment.

The tasks may include work such as support in preparing or gathering data for presentation at technical meetings, summarizing data to brief management on aspects of power plant operations, or preparing materials and participating in meetings, conferences and workshops to support EPA's outreach activities to the public, industry, and regulatory authorities. These materials may include reports, brochures, leaflets, posters, or other presentation materials. For purposes of preparing a work plan, the contractor shall assume there will be approximately ten written technical directives.

<b>TASK 6 – DELIVERABLE</b>	
<b>Deliverable</b>	<b>Due Date</b>
General technical support (as described above)	By written technical direction

#### **Task 7 – Technologies for Wastewater from Mines (PWS Section 3.6, 3.7, 4.0, 4.7, 5.0)**

The contractor shall assemble information and perform analyses related to treatment of wastewater from mines, with an emphasis on wastewater from abandoned mines in the western U.S. The primary focus of this task is to identify relatively low cost treatment technologies that can operate in remote areas for extended periods without on-site operators. The contractor shall also evaluate whether technologies are available that can offset the cost of treatment by recovering elements of value or otherwise producing a marketable residual.

<b>TASK 7 – DELIVERABLES</b>	
<b>Deliverable</b>	<b>Due Date</b>
Proposed study plan	November 30, 2016
Draft memorandum summarizing results of technology review	June 30, 2017
Final memorandum summarizing results of technology review	August 31, 2017

## **Attachment A – Improving the Deliverable Review Process**

Work Assignment 4-29 involves the production of several types of written products ranging from deliberative memos to published reports. The general work flow is for EPA to provide written guidance to the contractor on the development of these products. The contractor then develops the initial versions of these products. EPA reviews and revises these documents prior to finalization. Several iterations of development, review, and revision may be necessary prior to product finalization. The EPA WACOR and contractor will use the following terminology and clarify the expectations for each deliverable via written direction.

### Clarification of Terminology

One way for EPA to anticipate the amount of EPA review necessary for a contractor deliverable would be to better define the phase or version of the document in the development, review, and revision process. The following terms will be used in describing the phase or version of the contractor's deliverables: Concept Memo, First Draft, and Draft Final. These phases are described below.

*Concept Memo* – A document used to present ideas for discussion. The writing style is not necessarily formal and may be as simple as presenting a list of ideas or options. The concept memo is considered an internal deliberative document and may be the result of prior topic discussions (and brainstorming meetings) between EPA, the contractor, and other stake-holders. EPA does not expect this type of document to have received senior technical review or the input of a technical editor. However, the concept memo is expected to have received some level of review (*e.g.*, an internal contractor “peer-to-peer” review) prior to delivery to EPA. Based on past experience, a concept memo is most useful as a tool to guide EPA in determining the desired audience and structure of a future “public-ready” work product.

*First Draft* – An early version of a document that will ultimately be “public-ready”. The document may still be an internally deliberative product. The writing style is clear but formal. The audience and structure (such as outline or questions to be answered) have been previously defined by and reviewed with EPA. This version is considered appropriate for senior technical review, particularly to confirm that the document answers the questions it is meant to address and that the document is appropriate for the intended audience. It is reasonable to expect that senior technical review may lead to further conversations with EPA. EPA's review of the deliverable is intended to confirm that ideas and concepts are presented as intended.

*Draft Final* – A “public-ready” document that is ready for distribution to an internal audience (*e.g.*, EPA workgroup) or external audience (*e.g.*, EPA's Docket). The contractor shall confirm with EPA the intended audience for this document. Additionally, this version of the document incorporates EPA's comments on the previous versions of the document. Prior to submission to EPA the document will be reviewed by a technical editor to ensure consistency with the Executive Memorandum on 1 June 1998 directing the Executive Departments and Agencies to

write in plain language. Specifically, the technical editor will revise the document to address the following questions.<sup>2</sup>

- Is the document organized to serve the needs of readers?
- Does the document explain how it is organized and how to use it?
- Does the document start with items of most interest to reader?
- Are the chapter, table, and figure titles descriptive and helpful to readers in finding specific information more easily?
- Are complicated topics summarized before describing all the details?
- Does the document use the active voice?
- Does the document include only information readers actually need?
- Does the document use easy-to-read design features like lists, tables, graphics, and “white space”?
- Are citations for references clearly identified and does the reader know how to gain access to these references?

Additionally, the contractor will get approval from EPA on any other style sheets for Draft Final documents.

#### Clarification of EPA’s Expectations for Deliverables

The deliverable review process can be improved if EPA clearly states its expectations for when senior technical review should take place and the purpose of the review. Specifically, EPA should identify for the contractor the “big-picture” objectives and questions for the senior technical review to address. The review should be able to comment on the clarity of the document and whether the document met the objectives and answered the questions identified by EPA. The contractor will share with EPA a summary of the review.

---

<sup>2</sup> These questions were modified from the following EPA's website: <http://www.epa.gov/plainlanguage/faqs.htm>

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-29				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Steam Elec ELG Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance  From   09/29/2016   To   09/25/2017				
Comments:										
<input type="checkbox"/> Superfund    Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations data use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee: \$0.00		LOE: 0						
09/26/2012 To 09/25/2017										
This Action:		\$414,499.00		4,315						
Total:		\$414,499.00		4,315						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 10/13/2016		Cost/Fee \$414,499.00		LOE: 4,315						
Cumulative Approved:		Cost/Fee \$414,499.00		LOE: 4,315						
Work Assignment Manager Name   Ronald Jordan  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1003 FAX Number:				
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:				
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-30			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021		Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number      4		Title of Work Assignment/SF Site Name Alaskan Seafood Processors					
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   10/06/2016   To   09/25/2017			
Comments:									
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund									
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)  (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee:		LOE:					
09/26/2012   To   09/25/2017									
This Action:									
Total:									
Work Plan / Cost Estimate Approvals									
Contractor WP Dated:				Cost/Fee		LOE:			
Cumulative Approved:				Cost/Fee		LOE:			
Work Assignment Manager Name    Meghan Hessenauer  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number: 202-566-1040			
						FAX Number:			
Project Officer Name    Meghan Hessenauer  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number: 202-566-1040			
						FAX Number:			
Other Agency Official Name  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number:			
						FAX Number:			
Contracting Official Name    Brad Heath  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code:			
						Phone Number: 513-487-2352			
						FAX Number:			



**Performance Work Statement**  
**Contract EP-C-12-021**  
**Work Assignment 4-30**

**Title:** Technical Support for EPAs Response to the Industry Petition on ELGs for Non-Remote Alaskan Seafood Processors

**Work Assignment Contracting**

**Officer's Representative (WACOR):** Meghan Hessenauer

**Alternate Work Assignment Contracting**

**Officer's Representative (Alternate WACOR):** Todd Doley

**Period of Performance (POP):** October 6, 2016 through September 25, 2017

**Purpose:** The purpose of this work assignment is to outline the tasks for the contractor in adherence with the Performance Work Statement of Contract EP-C-12-021. Specifically, the contractor shall provide regulatory and technical support to the Office of Water, Engineering and Analysis Division, Alaskan Seafood Project Team in the development of responses to comments from the Notice of Data Availability (NODA) and to support the final rulemaking efforts.

**Background:** Under the Clean Water Act (CWA), EPA establishes national technology-based regulations, known as “effluent limitations guidelines and standards,” to reduce discharges of pollutants from industries to waters of the U.S. In the 1970s, EPA issued an effluent limitation guideline (ELG) establishing limits for seafood processing facilities in Alaska based upon location. The ELGs differentiated between non-remote seafood processing locations and remote seafood processing locations. In “non-remote” locations, the ELGs are based on the screening of the processing solids from the seafood processing wastewaters and disposing of the solids by means other than discharge to navigable waters. In “remote” locations, the ELGs are based on grinding of the processing solids to reduce the size of the waste pieces to no greater than ½ inch, which could then be discharged into the navigable waters as a part of the facility’s effluent. In 1980, EPA temporarily suspended the limits for non-remote regions of Alaska based on a petition from the seafood processing industry to allow EPA to consider new information. During the suspension EPA applied the remote limits based on grinding. In 1981, EPA issued a draft response, proposing to deny most of the petition and requested public comments on that response. EPA also indicated it would continue the suspension until a petition final response was issued. To date, EPA has not issued a final response.

After years of focus on other CWA discharge priorities, in 2010 EPA began the process leading to a final decision on a response to the petition. As a result, EPA recently gathered new data and information and performed supporting analyses to update the 1981 proposal. The recent data demonstrates a significant impact associated with near shore discharges of seafood waste where EPA has suspended the “non-remote” requirements. The primary concern with near shore discharges of seafood processing waste is the formation and persistence of waste piles at the

bottom of receiving waters. Near shore piles of fish processing waste cover large areas of the seafloor and contain large quantities of solids that negatively affect receiving water quality. These piles range in area from less than an acre up to tens of acres, and from relatively thin coverage of the bottom up to many feet thick. The waste piles smother benthic communities, deplete dissolved oxygen, and cause other harmful impacts on the aquatic ecosystem. In some cases, large waste piles do not dissipate, even with flushing from tides and strong channel currents. Where discharges have stopped, fish waste piles and their effects can remain for 10 years or more.

As a result of this new information, EPA provided preliminary results of analyses of the updated data and information in the Notice of Data Availability (NODA) dated November 2013. The comment period closed on March 7, 2014. EPA provided preliminary indications of how these results may be reflected in EPA's final response to petitions submitted in 1980 by certain members of the Alaskan seafood processing industry. In addition to the final response to the petition, EPA will respond to all comments, finalize site visit reports, and promulgate in final form amended ELGs applicable to certain Alaskan seafood processing discharges.

### **General Work Assignment Requirement:**

#### Deliverable Formatting and Terminology

Throughout this Work Assignment, the contractor shall provide draft and final reports to EPA in electronic and hard copy formats. The WACOR and contractor will use the terminology in this work assignment to improve the deliverable review process. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the WACOR prior to file preparation. The WACOR will identify for the contractor which documents will be posted on EPA's Effluent Guidelines webpage. The documents posted to the Effluent Guidelines webpage will need to be Section 508 compliant. For planning purposes, the contractor should assume that a Response to Comments document may be posted to the webpage.

#### Travel

Non-local travel by the contractor employees and/or subcontractors may be required to support the scope of this work assignment. The contractor shall provide specific travel details and costs in a request for travel approval by the WACOR and the Contract-Level COR (CL-COR) before each trip occurs (as specified by the contract per clause H.32).

#### Confidential Business Information

The contractor will, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor will manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in its "Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan," dated December 5, 2007 or its successor approved plans.

### Identification as Contracting Staff

To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public, the contractor should refer all interpretations of policy to the WACOR.

### Limitation of Contractor Activities

The contractor shall submit drafts of all deliverables to the WACOR for review prior to submission of the final product. The contractor shall incorporate all WACOR comments into all final deliverables, unless otherwise agreed upon by the WACOR. The contractor shall adhere to all applicable EPA management control procedures as implemented by the Contracting Officer (CO), CL-COR and WACOR.

### Deliverables

Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

### Deadlines

For the purpose of developing the work plan, the contractor shall assume the deliverable due dates provided with each task. Most of the deadlines are associated with Agency milestones which are subject to change. Any changes in schedule tend to result in extensions, rather than shorter schedules. In either case, if the schedule changes then the CL-COR or WACOR will change the deliverable deadlines through written technical direction. The CL-COR or WACOR also will use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance.

### Conferences, Meetings and Other Events

No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the CO, CL-COR and WACOR of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the CO.

### **Tasks (PWS Section 3.0 and 4.0):**

#### 1) Management of the Work Assignment

The contractor shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan

shall also include a list of the key personnel to participate in the work assignment. The contractor shall also estimate direct costs such as travel, computer costs, typing, etc. The workplan is due in accordance with contract requirements.

The contractor shall provide electronic copies of a monthly progress reports to the CO, CL-COR and WACOR. Each progress report shall describe the work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties. Finally, the monthly report should include a discussion of quality assurance progress.

The contractor and the EPA AK Seafood Team will meet via teleconference on a regular basis to review work progress and schedule.

2) Quality Assurance

EPA policy requires that an approved Quality Assurance Project Plan (QAPP) be in place before any work begins that involves the collection, generation, evaluation, analysis or use of environmental data. This work assignment is a continuation of work previously performed by contractor under WAs 30. A revised draft QAPP was prepared to support this project and is in Attachment A and Appendices. A final QAPP shall be prepared by the Contractor prior to use of new data. The Contractor shall assume that the QAPP will be finalized.

3) Comment Support

The contractor shall provide technical support to EPA's efforts to respond to public comments received on the NODA and 1981 proposed rule. The contractor shall update the draft final comment response document prepared in the previous WA. This support may include, but is not limited to, the following activities: compiling information that will be used to develop responses to comments; and drafting responses. Responses may consist of individual comment responses, or they may be in the form of essays that address major issues or frequently stated comments.

The contractor shall provide monthly reports regarding the status of comment response activities, including summary statistics for the number of comments for which responses have been drafted (or not drafted) and the review/approval status of the responses. The contractor shall supply all memos to the record to support the responses to comments. A final response to comment document shall be placed in the record prior to rule promulgation.

4) Analyses Support

The contractor shall provide a draft final costing analysis report to the WACOR upon technical direction. Analyses may include updating the memos used for the costing model. For planning purposes, the contractor shall assume there will be no more than three revisions to the draft costing analysis.

The final costing document will be placed in the record prior to rule promulgation.

5) Technical Support

The contractor shall provide technical support to the WACOR for outreach activities with stakeholders to clarify comments if needed. In addition, the contractor shall provide technical support in reviewing the 2015 site visit reports. The contractor shall also prepare a draft summary of all the site visit reports. The final site visit reports shall be placed in the record. The WACOR will provide written technical direction for all technical support.

6) Record Index and Docket Support

The contractor shall maintain and complete an accurate and detailed record index that documents all data collected and analyses performed to support this project. Both a non-CBI version, appropriate for submission to the EPA docket and, if necessary, a CBI record containing a complete set of CBI will continued to be maintained. The contractor shall regularly update the index listing all CBI and non-CBI materials gathered and submitted for inclusion in the record. The index itself is to be non-CBI and will be transferred to the docket as directed by the WACOR. The contractor shall also assemble non-CBI record information which can be transferred to the docket when necessary as directed by the WACOR. All records must be submitted to the WACOR before final promulgation.

7) Regulatory Support

The contractor shall assist EPA in developing and analyzing regulatory options and its implementation, based on comments on the 2013 NODA and 1981 Proposed Rule. Technical support under this task shall include preparing text for use in the response to the petition, Federal Register preamble, providing technical assistance in developing final language for the regulation. Tasks may also include providing supporting information and documentation for regulatory option packages, briefings, and selected analyses and data summaries. Deliverables under this task may include quick-response tasks.

**Deliverables:**

<b>Task</b>	<b>Deliverable</b>	<b>Deadline</b>
1	Workplan	In accordance with contract requirements
1	Monthly Progress Reports	Monthly
2	Revised QAPP	Due before new data can be used
3	Comment Response Support	Final Response to Comments before rule promulgation
4	Analyses Support	Final Costing Report before rule promulgation
5	Technical Support	Via Technical Direction
6	Record Index	Finalized before rule promulgation
6	Docket Support	Finalized before rule promulgation
7	Regulatory Support	Via Technical Direction

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-30				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Alaskan Seafood Processors				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance  From   10/06/2016   To   09/25/2017				
Comments:										
<input type="checkbox"/> Superfund    Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee: \$0.00		LOE: 0						
09/26/2012 To 09/25/2017										
This Action:		\$97,256.00		1,000						
Total:		\$97,256.00		1,000						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 11/02/2016		Cost/Fee \$97,256.00		LOE: 1,000						
Cumulative Approved:		Cost/Fee \$97,256.00		LOE: 1,000						
Work Assignment Manager Name    Meghan Hessenauer  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:				
Project Officer Name    Meghan Hessenauer  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:				
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name    Brad Heath  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-36			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021			Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Dental Amalgam Reg Support			
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   09/26/2016   To   09/25/2017			
Comments: The contractor shall not commence work on this work assignment until September 26, 2016.									
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund         <span>Accounting and Appropriations Data</span> <input checked="" type="checkbox"/> Non-Superfund       </div>									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars) (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:                      Cost/Fee:                      LOE: 09/26/2012   To   09/25/2017									
This Action:									
Total:									
Work Plan / Cost Estimate Approvals									
Contractor WP Dated:                      Cost/Fee                      LOE:									
Cumulative Approved:                      Cost/Fee                      LOE:									
Work Assignment Manager Name   Paul Shriner  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-1076 FAX Number:		
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:		
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:		
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:		

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-36			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021			Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number      4			Title of Work Assignment/SF Site Name Dental Amalgam Reg Support			
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   09/26/2016   To   09/25/2017			
Comments: The contractor shall not commence work on this work assignment until September 26, 2016.									
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund           <span>Accounting and Appropriations Data</span> <input checked="" type="checkbox"/> Non-Superfund         </div>									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)  (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee:		LOE:					
09/26/2012   To   09/25/2017									
This Action:									
Total:									
Work Plan / Cost Estimate Approvals									
Contractor WP Dated:				Cost/Fee		LOE:			
Cumulative Approved:				Cost/Fee		LOE:			
Work Assignment Manager Name   Paul Shriner						Branch/Mail Code:			
<div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Phone Number: 202-566-1076			
						FAX Number:			
Project Officer Name   Meghan Hessenauer						Branch/Mail Code:			
<div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Phone Number: 202-566-1040			
						FAX Number:			
Other Agency Official Name						Branch/Mail Code:			
<div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Phone Number:			
						FAX Number:			
Contracting Official Name   Brad Heath						Branch/Mail Code:			
<div style="display: flex; justify-content: space-between;"> <div>             (Signature)         </div> <div>9/22/2016 (Date)</div> </div>						Phone Number: 513-487-2352			
						FAX Number:			



**Performance Work Statement  
Contract EP-C-12-021  
Work Assignment 4-36**

**Title:** Dental Amalgam Effluent Guidelines Regulatory Support

**Work Assignment Manager (WACOR):**

Paul Shriner  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6233N  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-1076  
Fax: 202-566-1053  
E-mail: [highsmith.damon@epa.gov](mailto:highsmith.damon@epa.gov)

**Alternate Work Assignment Manager (WACOR):**

Damon Highsmith  
U.S. EPA/OW/OST/EAD (4303T)  
EPA West, Room 6233AA  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Phone: 202-566-2504  
Fax: 202-566-1053  
E-mail: [shriner.paul@epa.gov](mailto:shriner.paul@epa.gov)

**Period of Performance:** September 26, 2016 through September 25, 2017

**Background:** In October, 2014, EPA proposed pretreatment standards for dental facilities to reduce discharges of mercury to the environment. The agency focused its technology assessment on amalgam separators. OMB concluded review of the proposed rule in August, 2014. EPA has submitted the draft final rule to OMB for interagency review and expects to publish the final rule in December 2016.

Across the United States, many states and municipal wastewater treatment plants (publicly owned treatment works (POTWs)) are working toward the goal of reducing discharges of mercury to POTWs. Mercury is a concern to human health because it is a persistent bioaccumulative toxic element. Many studies have been conducted in an attempt to identify the sources of mercury entering these POTWs. According to the 2002 Mercury Source Control and Pollution Prevention Program Final Report prepared for the National Association of Clean Water Agencies (NACWA), dental clinics are the main source of mercury discharges to POTWs. A study funded by the American Dental Association (ADA) estimated in 2003 that 50 percent of mercury entering POTWs was

contributed by dental offices. EPA estimates that dentists discharge approximately 5.2 tons of mercury each year to POTWs. EPA estimates there are approximately 160,000 dentists working in over 120,000 dental offices that use or remove amalgam in the United States – almost all of whom discharge their wastewater exclusively to POTWs.

Mercury-containing amalgam wastes may find their way into the environment when new fillings are placed or old mercury-containing fillings are drilled out and waste amalgam materials that are flushed into chair-side drains enter the wastewater stream. Some of the waste amalgam particles that reach the sewer system settle out in the sewers, and some are carried to POTWs. The physical processes used in POTWs remove about 90% of the mercury received in wastewater. The mercury removed from wastewater then resides in the biosolids or sewage sludge generated during primary and secondary treatment processes.

EPA conducted a study of this industry as part of its 2006 Effluent Guidelines Plan. The Health Services Industry Detailed Study Report for Dental Amalgam (EPA-821-R-08-014) was completed in August 2008 (see [http://water.epa.gov/lawsregs/lawsguidance/cwa/304m/upload/2008\\_09\\_08\\_guide\\_304m\\_2008\\_hsi-dental-200809.pdf](http://water.epa.gov/lawsregs/lawsguidance/cwa/304m/upload/2008_09_08_guide_304m_2008_hsi-dental-200809.pdf).) Among other things, the 2008 study provided a profile of the industry, information on types and effectiveness of amalgam separators available, information on mercury discharges from dental facilities and, information on existing state and local amalgam separator requirements.

Under work assignment 1-36, 2-36, and 3-36 the contractor reviewed the Technical and Economic Development Document for consistency with the underlying analyses and for consistency with the preamble and regulatory language of the proposed rule, finalized outstanding items related to publishing the proposed rule (TEDD review), and parsed comments from the public, and created draft responses to comment. For this work assignment, the contractor will be tasked with: assisting with comment response, and providing general technical support in response to inquiries from EPA management. The contractor shall provide technical support and expertise for a variety of regulatory development activities. Support may include, but is not limited to, estimating pollutant discharges, analyzing the performance of amalgam separators, preparing briefings and outreach materials, and conducting other similar technical analyses that fall within the contract Performance Work Statement.

Throughout this Work Assignment, the contractor shall provide draft and final reports to EPA in electronic and hard copy formats. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the WACOR prior to file preparation.

Travel - EPA anticipates the need for non-local travel by the contractor employees and/or subcontractors to support the scope of this work assignment. Travel may be to conferences, or to meetings. EPA anticipates the need for 1-3 trips as a part of this work assignment.

Confidential Business Information - The contractor shall, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor shall manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in the Office of Science and Technology Confidential Business Information (OST-CBI) Application Security Plan (August, 2011), or its successor approved plans. See Task 4 for more details.

Meetings - To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties or visiting field sites.

Final Record Document Format - Final documents receiving an EPA publication number or intended for EPA webpage upload shall be 508 compliant. Section 508, an amendment to the United States Workforce Rehabilitation Act of 1973, is a federal law mandating that all electronic and information technology developed, procured, maintained, or used by the federal government be accessible to people with disabilities. For planning purposes, the contractor may assume the TEDD and any guidance, fact sheets, FAQs, or implementation manuals must meet the requirements of section 508. The WACOR will provide a checklist for 508 compliance.

Limitation of Contractor Activities - The contractor shall submit drafts of all deliverables to the WACOR for review prior to submission of the final product. The contractor shall incorporate all WACOR comments into all final deliverables, unless otherwise agreed upon by the WACOR. The contractor shall adhere to all applicable EPA management control procedures as implemented by the Contracting Officer (CO), Contract Level Contracting Officer's Representative (CL-COR), and WACOR.

**Task 1 – Program Management:**

The contractor shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. The contractor shall also provide a cost estimate including direct costs such as travel, computer cost, typing, etc.

The contractor shall prepare and deliver monthly progress reports to the WACOR and CL-COR. These reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The contractor shall inform the Contracting Officer, Project Officer, and the Work Assignment Manager in writing when 50%, 75%, and 90% of the allocated hours or dollars have been expended.

<b>TASK 1 – DELIVERABLES</b>	<b>Due Date</b>
Work Plan	• In accordance with contract requirements
Progress Reports	• Monthly

**Task 2 – Records Management (PWS Section 3.6):**

The contractor shall assemble and maintain a record of all documents relevant to the rulemaking proceedings. The contractor shall contact the Office of Water Docket to ensure that the record shall meet the docket's requirements including any E-Docket requirements. This includes preparation of electronic versions of documents for the Agency's E-Docket system. The index of rulemaking record materials shall be submitted to the WACOR monthly during the Inter Agency Review period of October, November, and December, and shall be submitted quarterly during the remainder of this WA. The record documents and index are to be delivered to the WACOR at the completion of the work assignment, or when directed by the WACOR in writing. This task includes uploading of the rule record into FDMS. For planning purposes, the contractor may assume the FDMS upload must be completed within 4 days of final rule signature. Finally, the contractor shall provide supporting information for briefings and support on FOIAs (i.e. locating and supplying the WACOR with relevant information from the record to be used in the Agency's response to the FOIA) as directed in writing by the WACOR.

<b>TASK 2 - DELIVERABLES</b>	<b>Due Date</b>
Maintain both the paper and the electronic the records	• Ongoing throughout the period of performance
Submit index of record materials to WACOR	• Monthly during October through December, and Quarterly otherwise
Submit record index	• September 25, 2016 or upon written technical direction from the WACOR
Upload rulemaking record into FDMS	• Upon written technical direction from the WACOR
Briefing / FOIA Support	• Ongoing throughout the period of performance by written technical direction.

**Task 3 – CBI Procedures (PWS Section 3):**

During the course of the work assignment, the contractor may be accessing and evaluating CBI. As such, the contractor shall adhere to EPA's CBI policy and procedures as described in the contract statement of work, Section 3. The contractor shall obtain CBI security clearance to use CBI information (Refer to Section H of the schedule for security requirements). The contractor shall utilize CBI information in accordance with contract requirements and limitations to include using the Office of Science and Technology Confidential Business Information (OST-CBI) Application Security Plan (August, 2011) or its successor approved plans.

**Task 4 – General Technical Support (PWS Section 3):**

Using information provided by the WACOR, along with information gathered or developed by the contractor, the contractor shall assemble information and perform analyses as directed by the WACOR through written technical direction. The tasks may include work such as support in preparing or gathering data for presentations at conferences, summarizing data to brief management, webpage materials, or preparing materials and participating in meetings, conferences and workshops to support EPA's

outreach activities to the public and industry. These materials may include reports, brochures, leaflets, posters, or other presentation materials. For purposes of preparing a work plan, the contractor shall assume there shall be approximately three written technical directives.

<b>TASK 4 – DELIVERABLE</b>	<b>Due Date</b>
General technical support (as above)	• by written technical direction

**Task 5 - Regulatory Support (PWS Section 3.5, 3.6)**

Upon written technical direction, the contractor shall assist EPA in developing and reanalyzing regulatory options and its implementation, based on comments on the proposed regulation provided during the comment period. Technical support under this task shall include preparing text for use in Federal Register preambles, providing technical assistance in developing revisions to the regulations, and assisting in the development of notices of data availability. Tasks may also include providing supporting information and documentation for regulatory option packages, briefings, and selected analyses and data summaries. For planning purposes, the contractor may assume a Federal Register notice of approximately 100 pages and an ICR supporting statement of approximately 30 pages will be developed during this WA. Deliverables under this task may include quick-response tasks.

<b>TASK 5 – DELIVERABLES</b>	<b>Due Date</b>
Draft text for inclusion in Federal Register preambles, draft regulatory text, and an ICR with a supporting statement	• by written technical direction
Analysis of regulatory options	• by written technical direction

**Task 6 – Response to Public Comments (PWS Section 3.5, 3.6, 4.0)**

The contractor shall continue to provide technical support to EPA's efforts to respond to public comments received on the proposed rule. This support may include, but is not limited to, the following activities: compiling information that will be used to develop responses to comments; and drafting responses. Responses may consist of individual comment responses, or they may be in the form of essays that address major issues or frequently stated comments. The contractor shall provide monthly reports regarding the status of comment response activities, including summary statistics for the number of comments for which responses have been drafted (or not drafted) and the review/approval status of the responses. For planning purposes, the contractor may assume all responses must be completed prior to signature of the final rule, estimated to occur around November 18, 2016.

<b>TASK 6 – DELIVERABLES</b>	<b>Due Date</b>
Draft response to public comments received for proposed rule	• By written technical direction

Monthly report of status of comment response activities	• Monthly
---	-----------

**Task 7 -- Technical and Economic Development Document (PWS Section 3.6):**

The contractor shall build upon the draft Technical Development Document, developed for the proposed rule under WAs 1-36 and 2-36 of this contract, for this industry. The contractor shall use information collected from public comments on the proposal in developing the document. The contractor also shall incorporate information from the economic assessment and environmental assessments, both of which shall be provided to the contractor. For planning purposes, the contractor may assume a final rule TEDD of approximately 150 pages will be developed during this WA period of performance.

<b>TASK 7 – DELIVERABLES</b>	<b>Due Date</b>
Draft TEDD for final rule	• by written technical direction
Final TEDD for final rule	• by written technical direction

**Task 7– Quality Assurance (PWS Section 3.1):**

**Quality Assurance Project Plans are required under the Agency’s Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1A2 and implementing guidance CIO-2105-P-01-0. All projects that involve the generation, collection, analysis and use of environmental data shall have an approved QAPP prior to the commencement of the work.**

**QA Project Plan Requirements**

EPA policy requires that an approved Quality Assurance Project Plan (QAPP) be in place before any work begins that involves the collection, generation, evaluation, analysis or use of environmental data. This work assignment is a continuation of work previously performed by the contractor under WA 8-36 of contract 68-C-02-095 and WAs 1-36 and 2-36 of this contract, and a QAPP was already prepared and approved by EPA to support work performed to support this project.

This continuation work assignment includes work to support the Steps 13, 14, 15, 16 and 17 that were not included in the effluent guidelines development process that were not included in the precursor to this Work Assignment. To ensure that all activities performed under this work assignment are compliant with EPA’s quality system requirements, the Contractor shall adhere to the previously approved QAPP.

**Data Quality Act/Information Quality Guidelines Requirements**

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor

shall submit a sanitized (i.e., public) version and an unsanitized (i.e., confidential) version at the time the QAPP is submitted for approval by EPA. The sanitized version shall be included in the public docket for the applicable rulemaking (or other docket or record), and the unsanitized version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" shall be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors shall indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the WACOR can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the WACOR, the Contractors may be requested to prepare pre-dissemination review checklist as described in Section 5.5 of the Office of Water Quality Management Plan, February 2009. If this is required, the WACOR shall notify the Contractor through written technical direction.

#### Additional QA Documentation Required

In addition to the QAPP requirements described above, all major deliverables (e.g., Technical Support Documents, Study Reports, Study Plans, etc.) produced by the Contractor under this work assignments shall include a discussion of the QA/QC activities that were or shall be performed to support the deliverable. For example, a Technical Support Document or Study Report shall include a clear discussion of the quality management strategies that were employed to control and document the quality of data generated and used.

The contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the QAPP, and corrective actions taken. If desired, the contractor may include this as a part of the contract-required monthly financial/technical progress report.

#### Sensitivity Analysis of Final Rule

As part of this task, the contractor shall develop a sensitivity analysis to be included in the final record and/or TEDD. This analysis shall include a sensitivity analysis of the costs, with a discussion of the cost drivers identified in the analysis and the expected influence the drivers would have on the total calculated costs of the final rule. In addition, this analysis shall include an evaluation of the data used in the loads analysis, the uncertainty of the data, and a range of loads that could be expected as a result of the



uncertainty.

<b>TASK 7 – DELIVERABLES</b>	<b>Due Date</b>
Monthly reports of QA work performed (may be included in the Contractor's monthly progress report.)	• Monthly
Sensitivity Analysis	• First draft no later than October 14, 2016 • Final document no later than November 18, 2016

**Task 8 - Implementation Support (PWS Section 3.5, 3.6)**

Activities under this task support the development of implementation support documents for permit writers and the regulated industry. This task includes post final rule documents including preparation of frequently asked questions, fact sheets, question and answer documents, case studies, development of benchmarks and document review processes for internal consistency, and related implementation support activities. This task may also include assistance in the development of a module(s) for the NPDES permit writer training sessions. Under this task, information and data may be collected and compiled to support the development and/or issuance of an e-reporting framework in support of the Office of Enforcement and Compliance (OECA) e-rule.

This task may involve non-local travel to workshops and/or conferences to explain the rule and related support documents created under this task. For the purposes of estimating costs, the contractor can assume up to two trips by two people; see the Travel section of this work assignment for more information.

<b>TASK 8 – DELIVERABLES</b>	<b>Due Date</b>
Implementation support Q and A	• By written technical direction
Concept memo for e-reporting framework	• By written technical direction

**Task 9 – Litigation Support (PWS Section 3.5, 3.6)**

This task includes administrative index assembly, record searches, review of EPA response to comment essays, and other searching and analysis related to litigation of the final rule. This task may also include technical support and permit review for purpose of developing briefings. Under this task, the contractor shall assemble the final docket index as defined and required by the court (Note this item may be different than maintaining the public docket index and the project file index as those deliverables are described in Task 2), shall conduct searches of comments and responses to support Agency legal briefings, and shall retrieve record items in support of Agency litigation. For purposes of the workplan, assume a rule challenge will require initiation of EPA legal briefs and preparations in summer 2017.



<b>TASK 9 – DELIVERABLES</b>	<b>Due Date</b>
Docket index	• By written technical direction
Record reviews for litigation support	• By written technical direction

## **ATTACHMENTS**

This section provides additional detailed project background or other necessary reference materials for contractor performance.

**Attachment A: Office of Science and Technology Confidential Business Information (OST-CBI) Application Security Plan. This attachment will be provided by the WACOR.**

**Attachment B: 508 Compliance Checklist. This attachment will be provided by the WACOR.**

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-36			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021		Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number      4		Title of Work Assignment/SF Site Name Dental Amalgam Reg Support					
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance  From   09/26/2016   To   09/25/2017			
Comments:									
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)  (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee: \$0.00		LOE: 0					
09/26/2012 To 09/25/2017									
This Action:		\$65,257.00		600					
Total:		\$65,257.00		600					
Work Plan / Cost Estimate Approvals									
Contractor WP Dated: 10/19/2016		Cost/Fee \$65,257.00		LOE: 600					
Cumulative Approved:		Cost/Fee \$65,257.00		LOE: 600					
Work Assignment Manager Name   Paul Shriner  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-566-1076 FAX Number:			
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-38			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021			Contract Period   09/26/2012   To   09/25/2017 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Oil & Gas Engineering Support			
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   09/26/2016   To   09/25/2017			
Comments: The contractor shall not commence work on this work assignment until September 26, 2016.									
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund           <span>Accounting and Appropriations Data</span> <input checked="" type="checkbox"/> Non-Superfund         </div>									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)  (Cents)	Site/Project (Max 8)	Cost Org/Code
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:                      Cost/Fee:                      LOE: 09/26/2012   To   09/25/2017									
This Action:									
Total:									
Work Plan / Cost Estimate Approvals									
Contractor WP Dated:                      Cost/Fee                      LOE:									
Cumulative Approved:                      Cost/Fee                      LOE:									
Work Assignment Manager Name   Karen Milam  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1915 FAX Number:			
Project Officer Name   Meghan Hessenauer  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name   Brad Heath  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

**Performance Work Statement  
Contract EP-C-12-021  
Work Assignment 4-38**

**Title:** Oil & Gas Engineering Support

**Work Assignment Contracting Officer's Representative (WACOR):**

Karen Milam  
USEPA Headquarters  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 4303T  
Washington, DC 20460

Phone: 202-566-1915  
Fax: 202-566-1053  
E-mail: [milam.karen@epa.gov](mailto:milam.karen@epa.gov)

**Period of Performance:** September 26, 2016 through September 25, 2017

**Purpose**

The purpose of this work assignment is to support EPA's continued efforts related to effluent limitations guidelines and standards (ELGs) for the oil and gas industry. This is a continuation of work begun under WA 3-38.

**Introduction**

The Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams or to sewage treatment plants. This work assignment supports EPA's development of effluent limitations guidelines and standards (collectively referred to as ELGs) for the oil and gas extraction point source category (40 CFR Part 435).

On June 28, 2016, EPA promulgated a rule to amend the Effluent Limitation Guidelines and Standards (ELGs) for the Oil and Gas Extraction Category, 40 CFR Part 435. Specifically, this rulemaking established pretreatment standards for discharges of pollutants from unconventional oil and gas extraction facilities under Subpart C. In a related action, EPA is also publishing a direct final rule and parallel proposal to extend the implementation date for existing sources under the UOG final rule that discharged to POTWs between April 7, 2015 to June 28, 2016.

EPA expects that record materials and underlying analyses for the direct final rule/parallel proposal will need to be revised or be created to respond to public comments. This period of performance (POP) will include analysis of comments, and associated revisions to analyses to address comments; briefing material support; preparing drafts and final publication versions of

the final rule, preamble, and support materials; preparing for and addressing comments from the final agency review process and the interagency review process; finalizing all supporting materials; and preparing the public rulemaking docket. This POP may also include litigation support such as finding relevant record materials and performing additional analyses.

### **General Work Assignment Requirements (PWS Section 3.0)**

#### Deliverable Formatting and Terminology

Throughout this work assignment, the contractor shall provide draft and final reports to EPA in electronic format, with hard copy format also provided when directed by the work assignment manager. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the WACOR prior to file preparation. The WACOR will identify for the contractor which documents will be posted on EPA's Effluent Guidelines webpage. These documents posted to the Effluent Guidelines webpage must be Section 508 compliant.<sup>1</sup>

#### Travel

Non-local travel by the contractor employees and/or subcontractors will be required to support the scope of this work assignment (e.g., attending conferences, public meetings). The contractor shall provide specific travel details and costs in a request for travel approval by the WACOR and the Contract Level Contracting Officer's Representative (CL-COR) before each trip occurs (as specified by the contract per clause H.32).

#### Event Expenses Not to Exceed \$20,000

No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, PO and WACOR of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer (CO).

#### Confidential Business Information

The contractor shall, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor shall manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in the "Security Plan for Handling Confidential Business Information Under the Clean Water Act" (September 2002) or its successor approved plans.

---

<sup>1</sup> See <http://www.epa.gov/epahome/accessibility.htm>.

#### Identification as Contracting Staff

To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public the contractor should refer all interpretations of policy to the WACOR.

#### Limitation of Contractor Activities

The contractor shall submit drafts of all deliverables to the WACOR for review prior to submission of the final product. The contractor shall incorporate all WACOR comments into all final deliverables, unless otherwise agreed upon by the WACOR. The contractor will adhere to all applicable EPA management control procedures as implemented by the CO, CL-COR and WACOR.

#### Deliverable Due Dates

For the purpose of developing this work plan, the contractor shall assume the deliverable due dates in the tables for each task presented further. Major technical deliverables shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

### **IV- Tasks**

#### **Task 1: Program Management**

The contractor shall prepare and submit a detailed work plan that outlines the approach and methodology that shall be used to perform the tasks identified in this Work Assignment. The work plan shall specify the work to be done for each task, and the allocation of personnel, hours and budget by task and deliverables. The work plan shall be submitted to the CL-COR/WACOR in accordance with contract requirements.

This task also includes contract management such as communications between EPA Contracting Officer Representatives and their respective contractor counterparts. These communications would concern the progress made on the work assignment tasks and coordination of activities to facilitate optimal contractor performance.

The contractor shall provide electronic copies of the monthly progress reports to the WACOR and CL-COR. Each progress report shall describe the technical work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties. The contractor shall inform the CO, CL-COR and WACOR in writing when 50%, 75%, and 90% of the allocated hours or dollars have been expended.

In addition to the monthly progress reports, the contractor shall prepare monthly status summaries to the WACOR and CL-COR. The monthly status reports shall list the following information by task: summaries of costs and LOE expended for the reporting period; a table of hours by personnel for each task; and the cumulative hours (LOE) and dollars (and the percentage of each) expended for each task. The monthly summaries of costs and expenditures

LOE shall be provided prior to the progress report. The contractor shall email copies to the CL-COR, WACOR, and Alternate WACOR.

<b>TASK 1 DELIVERABLES</b>	<b>DEADLINES</b>
Work Plan	In accordance with contract requirements
Progress Reports	monthly
Work assignment summaries	monthly

### **Task 2: Quality Assurance**

EPA policy requires that an approved Quality Assurance Project Plan (QAPP) or Programmatic Quality Assurance Project Plan (PQAPP) be in place for work that involves the collection, generation, evaluation, analysis or use of primary environmental data. The QAPP or PQAPP defines and documents how specific data generation and collection activities shall be planned, implemented, and assessed during a particular project. This contract has an approved PQAPP for all necessary work envisioned under this work assignment. There is no primary data collection envisioned under this work assignment. However, the contractor will continue to utilize existing data that is available in the literature, from conferences and meetings, and compiled in site visits conducted under previous periods of performance.

The contractor has an approved supplemental QAPP (SQAPP) that provides specific details and criteria regarding data source categorization and source selection that is specific to the quality requirements under this project. Because this project involves using the collected data to describe the industry and to characterize the wastewater generated by the industry, but not to develop numeric limits, the source characterization strategies outlined in the SQAPP are sufficiently rigorous and appropriate for this project.

### **Background**

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1 A2 (May 2000), and implementing guidance CIO-2105-P-01-0 (May 2000). All projects that involve the generation, collection, analysis, and use of environmental data must have an approved Quality Assurance Project Plan (QAPP) in place prior to the commencement of the work. Examples of these environmental data operations are provided in **Table 2-1** below.

**Table 2-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data**

<b>Item</b>	<b>Examples</b>
Data	Includes field sampling information (sample location information, flow measurements, temperature, pH, physical observations, etc.), laboratory measurements (e.g., chemical, physical, biological, radiological measurements), data collected from questionnaires, economic data, census data, and any other types of existing data (i.e., data generated for a different purpose or generated by a different organization)

**Table 2-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data**

Item	Examples
Data generation	Includes field studies, laboratory studies, and generation of modeling output
Data collection	Includes field surveys, questionnaire surveys, literature searches, and third party data
Data evaluation	Includes data inspection, review, assessment, and validation
Data analysis	Includes statistical, engineering, and economic analysis, and testing, evaluation, and validation of methods and models; database creation, data extraction, and data manipulation
Data Use	Any use of data to support EPA decisions, regulations, policy, publications, or tools (including effluent guidelines, 304(m) program, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs)

Note that QAPPs are required for the development or revision of models and software that support the generation, collection, evaluation, analysis, or use of data. (A model is set of equations and assumptions used to predict unknown data.) When existing models are used as a tool to generate or evaluate data, the project QAPP must describe the model and explain how it will be used and how its output will be evaluated to ensure the modeling effort meets the overall quality objectives for the project. Development or revision of new models also must be supported by a QAPP that describes the objectives for the model, the quality criteria that will be applied to the model, and the procedures for evaluating whether the model meets those criteria.

### ***QA Project Plan Requirements***

The Contractor has previously prepared a contract-wide Programmatic QAPP (PQAPP) for Contract EP-C-12-021. This PQAPP describes, in a single document, information that is not site or time-specific, but applies throughout the program (i.e., the duration of the contract). When tasked with preparing the PQAPP, the Contractor was informed that the PQAPP may need to be supplemented with project-specific details to support individual work assignments that involve the collection, generation, evaluation, analysis, or use of environmental data.

The activities in this work assignment involve gathering, evaluating, analyzing, and otherwise using existing environmental data (also known as “secondary” use of data). However, EPA has determined that the Contractor is operating under the existing PQAPP and that the PQAPP, and the supplemental information in the SQAPP prepared under WA 1-38, address QA requirements for this work assignment. In support of this work assignment, the Contractor shall ensure that the work plan provides enough detail to clearly describe:

- Specific objectives of the project(s) supported by this work assignment, including typical questions that must be answered when collecting and analyzing existing data to support the development of Effluent Limitations Guidelines and Standards.
- The type of data to be gathered or used under this work assignment to support the project objectives—including data from search engines, federal databases, EPA data bases—as a



well as a rationale for when those databases are appropriate and what data available in each will support the project

- The quality objectives needed to ensure the data will support the project objectives, and
- The QA/QC activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.

Table 2-2 at the end of this Task demonstrates how the quality elements are addressed for this project through the contract-level programmatic QAPP (PQAPP), the UOG project-specific supplemental QAPP (SQAPP), and related project documentation.

### ***Additional QA Documentation Required***

The EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0, May 2000) requires published Agency reports containing environmental data to be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their originally intended application. The EPA Quality Manual further requires Agency reports to be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is included. The purpose of the review is to ensure the reports provide enough information to enable a knowledgeable reader to determine if the technical and quality goals were met for the intended use of the data. Reports should include applicable statements regarding the use of any environmental data presented as a caution about possible misuse of the data for other purposes. For example, a Technical Support Document or Study Report must include a clear discussion of the quality management strategies (including the project goals and objectives, quality objectives and criteria, and QA/QC practices) that were employed to control and document the quality of data generated and used. These documents should also discuss any deviations from procedures documented in the EPA-approved QAPP(s) supporting the project, the reasons for those deviations, any impact of those deviations had on data quality, and steps taken to mitigate data quality issues.

In support of this Agency requirement, all major deliverables (e.g., Technical Support Documents, Reports) produced by the Contractor under this work assignment must include a discussion of the QA/QC activities that were performed to support the deliverable, and this discussion must provide a sufficient level of detail to allow the EAD QA Coordinator (or designee) to determine if the QA/QC strategies implemented for the project sufficiently support the intended use of the data. Upon receipt, the WACOR will review each applicable report and certify whether the Contractor has adhered to the QA requirements documented in the Contractor's PQAPP and SQAPP.

The Contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the PQAPP and SQAPP, and corrective actions taken. If desired, the Contractor may include this as a part of the contract-required monthly financial/technical progress report.

### ***Data Quality Act/Information Quality Guidelines Requirements***

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/ data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. (This includes PQAPPs and SQAPPs.) The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a sanitized (i.e., public) version and an unsanitized (i.e., confidential) version at the time the QAPP is submitted for approval by EPA. The sanitized version shall be included in the public docket for the applicable rulemaking (or other docket record), and the unsanitized version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency* (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" should be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors should indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the WACOR can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the WACOR, the Contractors may be requested to prepare pre-dissemination review checklist as described in Section 5.5 of the Office of Water Quality Management Plan, February 2009. If this is required, the WACOR shall notify the Contractor through written technical direction.

<b>TASK 2 DELIVERABLES</b>	<b>DEADLINES</b>
Monthly reports of QA work performed (may be included in the Contractor's monthly progress report)	Monthly

**Table 2-2. Explanation of quality elements and how they are addressed under the Unconventional Oil and Gas Extraction Engineering Support Work Assignment 1-38 through 4-38 under contract number EP-C-12-021**

QAPP Element	Applicable Section in PQAPP	Applicable Section in SQAPP	Explanatory Comments
<b>A1. Title &amp; Approval Sheet</b>			
Project title		TITLE PAGE	
Organization's name	TITLE PAGE		
Effective date and/or version identifier	TITLE PAGE	TITLE PAGE	
Dated signature of Organization's project manager		APPROVAL SHEET	
Dated signature of Organization's QA manager	APPROVAL SHEET	APPROVAL SHEET	
Other signatures, as needed (e.g., EAD Project Officer, EAD QA Coordinator)	APPROVAL SHEET	APPROVAL SHEET	
Revision History	TABLE INCLUDED	TABLE INCLUDED	
<b>A2. Table of Contents</b>			
Includes sections, figures, tables, references, and appendices	TOC	TOC	
Document control information indicated (when required by the EPA Project Manager and QA Manager)			N/A
<b>A3. Distribution List</b>			
Includes all individuals who are to implement or otherwise receive the QAPP and identifies their organization	SEC 2.1	SEC 2.1	
<b>A4. Project/Task Organization</b>			
Identifies key individuals with their responsibilities (e.g., data users, decision makers, project QA manager, Subcontractors, etc.) and contact info.	SEC 2.4 - GENERAL	SEC 2.2	
Organization chart shows lines of authority & reporting responsibilities	SEC 2.4 - GENERAL	SEC 2.2	
Project QA manager position indicates independence from unit collecting/using data	SEC 2.4	SEC 2.2	
<b>A5. Problem Definition/Background</b>			
Clearly states problem to be resolved, decision to be made, or hypothesis to be tested	SEC 2.2-2.3 GENERAL	SEC 2.2	Also see Technical Development Document (TDD) developed for proposal under WA 2-38 (Proposal TDD)
Identifies project objectives or goals	SEC 2.2-2.3 - GENERAL	SEC 2.2	Also see Proposal TDD
Historical & background information	SEC 2.3 - GENERAL	SEC 2.2	Also see Proposal TDD
Cites applicable technical, regulatory, or program-specific quality standards, criteria, or objectives	SEC 2.3 - GENERAL	SEC 2.2	Also see Proposal TDD

**Table 2-2. Explanation of quality elements and how they are addressed under the Unconventional Oil and Gas Extraction Engineering Support Work Assignment 1-38 through 4-38 under contract number EP-C-12-021**

<b>QAPP Element</b>	<b>Applicable Section in PQAPP</b>	<b>Applicable Section in SQAPP</b>	<b>Explanatory Comments</b>
<b>A6. Project/Task Description</b>			
List measurements to be made/data to obtain	SEC 2.3 - GENERAL	SEC 2.2	
Notes special personnel or equipment requirements		SEC 2.2	
Provides work schedule	SEC 2.3		Details in WA and work plans from current and past UOG WAs
<b>A7. Overall Quality Objectives &amp; Criteria</b>			
States overall quality objectives and limits needed to support the project goals and objectives cited in A5	SEC 4.2-4.3	SEC 3.0-3.2	
<b>A8. Special Training Requirements/ Certifications</b>			
Identifies specialized skills, training or certification requirements	SEC 2.6		
Discusses how this training will be provided/the necessary skills will be assured and documented	SEC 2.6		
<b>A9. Project-level Documents &amp; Records</b>			
Describes process for distributing the approved QAPP and other planning documents (and updates) to staff	SEC 2.1	Sec 2.1	
Identifies final work products that will result from the project		SEC 2.2	Details in WA and work plans from current and past UOG WAs
Describes the process for developing, reviewing, approving, and disseminating the final work products and individuals responsible for these processes	SEC 2.8 - GENERAL	SEC 4.0	
<b>B1. Data Needs</b>			
Detailed list/description of the specific data elements needed to support project goals		SEC 3.0	
Description of the scope of the data elements that you need (e.g., data supporting specific treatment options vs. the full range of options, data supporting the entire country vs. a specific geographic region)		SEC 2.2 & 3.0	
If project includes development or update of a project database, QAPP identifies and defines each database field	SEC 4.1, 4.2	SEC 3.2 – General	
<b>B2. Potential Data Sources</b>			
Identifies and describes potential sources of the existing data needed (e.g., photographs, topographical maps, facility or state files, census data, meteorological data, publications, etc.) and the rationale for their use	SEC 3.1, 4.0-4.3	SEC 2.2, 3.1	
If literature searches are used, describes the search engines that will be used and key search terms	SEC 4.1		Majority of references from public comments

**Table 2-2. Explanation of quality elements and how they are addressed under the Unconventional Oil and Gas Extraction Engineering Support Work Assignment 1-38 through 4-38 under contract number EP-C-12-021**

<b>QAPP Element</b>	<b>Applicable Section in PQAPP</b>	<b>Applicable Section in SQAPP</b>	<b>Explanatory Comments</b>
If databases or models will be used, describe the database (or model) in terms of who developed it and operates it and the type of data it contains	SEC 4.2		
For other potential sources, describe the potential sources & rationale for considering or using each one	SEC 4.1		Addressed generally in PQAPP, not very applicable to this project
<b>B3. Criteria for Selecting Data Sources</b>			
Identifies each criterion that will be used to determine if the candidate data sources listed in B2 will meet your needs, and how each criterion is defined. (Criteria vary by project; examples include reliability, age, applicability, quantity, format, and others)	SEC 4.1	SEC 3.1	
Explains rating system used to evaluate source against each criterion		SEC 3.1	
<b>B4. Data Value Selection Approach</b>			
For data sources that meet the criteria identified in B3: Describes the criteria and procedures that will be used to determine which value(s) identified in the acceptable sources are most appropriate for use in the project		SEC 3.0-3.2	
For data that do not meet these pre-established criteria but are the only data available, explains how the decision to use such data will be made and documented		SEC 3.1	
<b>B5. Resolving Data Gaps</b>			
Describes the process for identifying and addressing data gaps that still exist after candidate data sources have been evaluated and appropriate data values have been identified	SEC 4.1, 4.3, SEC 7	SEC 3.1	
Describes the process that will be used to address any new data needs revealed during the data gathering process (i.e., additional data elements not previously considered)	SEC 4.1, 4.3, SEC 7		
<b>B6. Data Gathering Documentation and Records</b>			
Describes how results of the source selection and the data value selection will be documented, including any sources or values that were rejected and the rationale for not using them		SEC 3.1	
For data that are deemed acceptable and that will be used, explains how each data element will be associated to its original source citation (i.e., bibliographic information, telephone contact reports, email messages, etc.)	SEC 2.1	SEC 3.2	

**Table 2-2. Explanation of quality elements and how they are addressed under the Unconventional Oil and Gas Extraction Engineering Support Work Assignment 1-38 through 4-38 under contract number EP-C-12-021**

<b>QAPP Element</b>	<b>Applicable Section in PQAPP</b>	<b>Applicable Section in SQAPP</b>	<b>Explanatory Comments</b>
<b>C1. Standardization of Data Elements</b>			
Describes the process to ensure that units and other key measures are captured and standardized (or otherwise made comparable) in the database	SEC 4, SEC 7		Contract requirement.
If the project requires that all fields be standardized to a single set of units (e.g., US dollars for economic data, µg/L for chemical data), identifies the standard units that will be required for each data element			N/A
Identifies the procedures for converting data reported in other units to the standardized units, including any rounding or truncating procedures, and procedures for ensuring these conversions are performed correctly	SEC 4, SEC 7		
If standardization of data elements is not needed, explains the process for ensuring that data presented in varying units are comparable enough for use in the project and that project staff members and other data users will be able to readily identify differences in units	SEC 4, SEC 7		
<b>C2. Data Entry</b>			
Explains the process for manually entering selected data into the project database, who will be responsible for such data entry, and the QC strategies that will be used to ensure that the database accurately and completely captures the data as presented in the original source	SEC 4, 7, 8.3-8.4		
<b>C3. Merging or Uploading Electronic Data from Existing Sources</b>			
If data are available electronically and will be uploaded or merged into the project database: describes the procedures that will be followed to ensure that errors are not introduced during the upload/merge process and that the final database reflects the original dataset(s)	SEC 4, 8.3		
<b>C4. Data Review</b>			
Describes the process for ensuring that the data have been recorded, transmitted, and processed correctly	SEC 8.0-8.3		
<b>C5. Data Storage and Manipulation</b>			
Describes how the existing data will be stored	SEC 8.3-8.6		
Describes who will be responsible for access to and maintenance of the stored data	SEC 8.3-8.6		
Describes how the existing data will be incorporated with other project data to support the project goal/decision to be made	SEC 8.1		

**Table 2-2. Explanation of quality elements and how they are addressed under the Unconventional Oil and Gas Extraction Engineering Support Work Assignment 1-38 through 4-38 under contract number EP-C-12-021**

<b>QAPP Element</b>	<b>Applicable Section in PQAPP</b>	<b>Applicable Section in SQAPP</b>	<b>Explanatory Comments</b>
Describes the QC strategies that will be employed to ensure that the integrity of the data is not compromised during data storage, access/retrieval, updates, or other manipulation	SEC 8.3-8.6, 9.2		
<b>D1. Data Quality Verification and Data Quality Reporting</b>			
Describes the process for verifying that the final set of data meets the overall criteria originally specified for the project	SEC 8.3-8.4		
Describes how these determinations will be documented and reported		SEC 4.0	
For data that don't meet the pre-established specifications, explains the process for determining if they are usable and how such decisions will be documented	SEC 8.3	SEC 4.0	
<b>D2. Use/Analysis of the Existing Data</b>			
Provides details regarding the exact means in which the data will be used to meet project objectives		SEC 2.2, 3.0-3.1	
Includes an explanation or list of the information to be calculated and the data elements that will be used to make those calculations	SEC 4, 7		
Includes applicable calculations and equations (if known) or explanations of how they will be developed			
Includes plans for excluding outliers	SEC 3.1		
<b>D3. Methodology Documentation and Conceptual Review</b>			
If exact methodologies for analyzing the data will need to be developed or modified during the course of data analysis, explains the process by which such methodologies will be documented, who is responsible for reviewing/ approving their use, and how the methodologies will be checked to ensure they yield the desired products	SEC 4.1	SEC 3.1	
<b>D4. Technical Review of the Data Analysis</b>			
Describes activities that will be used to ensure the data analyses are being implemented as specified and will support project objectives	SEC 4, 7	SEC 4.0	
Explains procedures for identifying and notifying appropriate personnel if changes to the originally planned procedures are warranted, and the process for approving, documenting and implementing such changes	SEC 4.1		

**Table 2-2. Explanation of quality elements and how they are addressed under the Unconventional Oil and Gas Extraction Engineering Support Work Assignment 1-38 through 4-38 under contract number EP-C-12-021**

<b>QAPP Element</b>	<b>Applicable Section in PQAPP</b>	<b>Applicable Section in SQAPP</b>	<b>Explanatory Comments</b>
<b>D5. Final Verification of Data Analysis and Reconciliation with User Requirements</b>			
Describes the process for reviewing the final work product to ensure that the work was generated in accordance with the QAPP, and that the work product addresses the overall project goals and objectives		SEC 4.0	
Describes how the results of this assessment will be documented		SEC 4.0	
Describes how any limitations of the data or data analyses that were used to prepare the final work product will be documented and communicated	SEC 4, 7		

### **Task 3: Confidential Business Information**

During the course of the work assignment, the contractor shall be accessing and evaluating CBI. As such, the contractor shall adhere to EPA's CBI policy and procedures as described in the contract performance work statement, Section 3.0, for all tasks in this WA, as applicable. The contractor shall obtain CBI security clearance to use CBI information as outlined in Section 3.0 of Contract EP-C-12-021. The contractor shall utilize CBI information in accordance with contract requirements and limitations to include using its most recent "Security Plan for Handling Confidential Business Information under the Clean Water Act." The contractor shall also utilize CBI information in accordance with contract requirements and limitations, including the TSCA CBI security plan as required.

<b>TASK 3 DELIVERABLES</b>	<b>DEADLINES</b>
A CBI program in compliance with the requirements of contract EP-C-12-021 and the requirements of the contractor's CBI Plan.	Ongoing

### **Task 4: General Technical Support**

Using information provided by the WACOR, along with information gathered or developed by the contractor, the contractor shall assemble information, create and/or modify documents and perform analyses related to oil and gas operations as directed by the WACOR through written technical direction. The tasks may include work such as:

- Summarizing data to brief management
- Collecting and analyzing secondary data, which may involve writing memos which summarize the data
- Revising work products prepared under WA 3-38 based on comments provided by EPA



- Editing questions and answers for publication on EPA’s website provided by EPA (EPA will draft the first version).
- Contacting less than 3-4 State oil and gas agencies to collect information about common wastewater management practices and availability of underground injection, produced water treatment facilities, and POTWs in each State
- Technical support for potential litigation on UOG final rule

For purposes of preparing a work plan, the contractor shall assume that there shall be approximately ten (10) written technical directives requiring quick turn-around (1-2 days of support). Specifically, for technical support on potential litigation, the contractor shall assume there will be approximately two (2) technical directives with a 1 week turnaround; and 1 technical directive with a 2 day turnaround.

<b>TASK 4: DELIVERABLES</b>	<b>DEADLINES</b>
General technical support (as above)	2 days after receiving technical direction, or as specified in technical direction, from the WACOR
Technical support for potential litigation	By written technical direction, contractor can assume 2 1 week; and 1 2 days after receiving technical direction.

#### **Task 5: Environmental Engineering Analyses**

The contractor shall revise analyses and engineering support memoranda developed under previous work assignments (1-38, 2-38, 3-38) based on information received during public comments, internal EPA review, and new sources identified by EPA following the direct final rule and parallel proposal. This includes revisions to supporting analyses and memos that are referenced by the TDD, or were included in the rulemaking record.

Specifically, these analyses will include a memo on conventional oil and gas facilities sending to POTWs. The contractor shall assume a 20-30 page memo deliverable (mostly written under WA 3-38) on conventional oil and gas facilities, including a spreadsheet that will be due 1 month after receipt of the work assignment.

Based on public comments received on the proposal, the contractor may be asked update the underlying data and analyses that are summarized as part of the TDD and supporting memos. For planning purposes, the contractor can assume 3 new data sources (in the form of articles, tables, and conference presentations) are identified during the performance period and will be reviewed and summarized for EPA and potentially incorporated into the analyses.

<b>TASK 5: DELIVERABLES</b>	<b>DEADLINE</b>
Review of new data sources provided during public comment period	By written technical direction from EPA.

Updated version of memorandum based on new data sources identified after direct final rule and parallel proposal.	By written technical direction from EPA; specifically for the conventional oil and gas memo a deliverable of 1 month after receipt of work assignment.
Revised support memorandum for the final rule, based on comments from EPA	Within 7 days of receiving comments from EPA, or as otherwise specified by EPA
Final support memorandum for the final rule, based on final comments from EPA	Within 7 days of receiving comments from EPA, or as otherwise specified by EPA

### **Task 6: Record Support**

This task includes maintaining the electronic documents and record materials that support the rulemaking, as well as work associated with updating EPA and/or contractor generated record documents, as needed based on data and comments that are received during the POP.

The contractor shall assemble and maintain a record of all documents relevant to the rulemaking proceedings. The contractor shall request authorization from EPA to contact the Water Docket and enter information into FDMS. When authorization is received, the contractor shall contact the Office of Water Docket to ensure that the record will meet the dockets requirements including any electronic docket requirements. This includes preparation of electronic versions of documents for the Agency's electronic docket system. The contractor will be the lead for all uploading/coordination of record items for this rulemaking docket, therefore this will include deliverables and record items submitted by other contractors supporting the rulemaking. The index of rulemaking record materials shall be submitted to the EPA at least two weeks prior to upload (for planning purposes, upload can be expected to occur on December 13, 2016). The record documents and index are to be delivered to the WACOR upon completion of the Work Assignment or when directed by the WACOR in writing. The contractor will support the uploading of all record materials for the final rulemaking to the electronic docket prior to final rule publication (for planning purposes, publication can be expected on December 13, 2016).

In addition, the contractor shall provide support in responding to Freedom of Information Act (FOIA) requests for records. Such support includes researching existing documentation to identify potentially responsive records for the FOIA request and/or any FOIA appeal, and assisting EPA in compiling responsive documents. For purposes of developing the work plan, the contractor should assume that there will be approximately five FOIA requests for which support described above may be required.

<b>TASK 6: DELIVERABLES</b>	<b>DEADLINE</b>
Maintain both the paper and the electronic records	Ongoing throughout the period of performance
Submit index of record materials to WACOR	Two weeks prior to upload (expected to be

	approximately December 13, 2016)
Submit record documents and index to WACOR	Upon completion of the Work Assignment or written technical direction from the WACOR before the completion of the WA.
Complete the upload of documents to the docket for the final rule	Prior to final rule publication (expected on December 20, 2016)
Identify/compile FOIA-responsive records	By written technical direction

### **Task 7: Comment Support and Documentation**

The contractor shall provide technical support to EPA's efforts to respond to public comments submitted to the public rulemaking docket. These comments may be in response to 304(m) notice, as they pertain to the unconventional oil and gas industry (including shale gas extraction and coalbed methane), the proposed rule, and any subsequent NODAs. The contractor shall also provide technical support to EPA's efforts to respond to interagency review comments.

Support for response to public comments may include, but is not limited to, the following activities: reviewing, assessing, and compiling public comments; supporting the coding of comments; tracking comments and comment responses in a spreadsheet; compiling information that will be used to develop responses to comments; and drafting responses as needed. Responses may consist of individual comment responses, or they may be in the form of essays that address major issues or frequently stated comments. The contractor shall provide bi-weekly tracking reports regarding the status of comment response activities, including summary statistics for the number of comments for which responses have been drafted (or not drafted) and the review/approval status of the responses.

<b>TASK 7: DELIVERABLES</b>	<b>DEADLINE</b>
Draft portions of response to public comments received for proposed rule	By written technical direction
Monthly report of status of comment response activities	Bi-weekly

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-38	
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:	
Contract Number EP-C-12-021		Contract Period 09/26/2012 To 09/25/2017		Title of Work Assignment/SF Site Name			
		Base                      Option Period Number      4		Oil & Gas Engineering Support			
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS			
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval				Period of Performance  From 09/26/2016 To 09/25/2017			
Comments:							
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund							
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations data use EPA Form 1900-69A.							
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)      (Cents)      Site/Project (Max 8)      Cost Org/Code
1							
2							
3							
4							
5							
Authorized Work Assignment Ceiling							
Contract Period:		Cost/Fee: \$0.00		LOE: 0			
09/26/2012 To 09/25/2017							
This Action:		\$63,143.00		674			
Total:		\$63,143.00		674			
Work Plan / Cost Estimate Approvals							
Contractor WP Dated: 10/11/2016		Cost/Fee \$63,143.00		LOE: 674			
Cumulative Approved:		Cost/Fee \$63,143.00		LOE: 674			
Work Assignment Manager Name Karen Milam  _____ (Signature)                      (Date)						Branch/Mail Code:	
						Phone Number: 202-566-1915	
						FAX Number:	
Project Officer Name Meghan Hessenauer  _____ (Signature)                      (Date)						Branch/Mail Code:	
						Phone Number: 202-566-1040	
						FAX Number:	
Other Agency Official Name  _____ (Signature)                      (Date)						Branch/Mail Code:	
						Phone Number:	
						FAX Number:	
Contracting Official Name Brad Heath  _____ (Signature)                      (Date)						Branch/Mail Code:	
						Phone Number: 513-487-2352	
						FAX Number:	